

# GNX Privacy Policy

Last updated: March 2024

GNX BV (hereinafter “GNX,” “we” or “us”) is committed to protecting the personal information of its users. This Privacy Policy (hereinafter “Policy”) explains how GNX uses personal data obtained through the use of our website. By accessing or using [www.gnx.net](http://www.gnx.net), you acknowledge that you have read and understood this Policy. This Policy may change from time to time; any changes we make to this Policy will be posted on our website. We will also take any other steps as required by applicable law, including notifying you of any material changes. Changes to this Policy are effective as of the posted “Last Updated” date on the website. We recommend that you check the Policy periodically for any updates or changes.

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## The short version

The information we collect – Most of the information we collect is information you provide to us through your interaction with our website. We also collect information about your communications with GNX. In addition, we automatically collect information while you access, browse, view or otherwise use the website. We may also receive information from third party vendors or other available sources.

The legal bases upon which we collect your information - Where relevant under applicable

laws, all processing of your personal information will be justified by a "lawful ground" for processing as detailed below.

How we will use your information – We use personal information to provide you with quality service and security, to operate the website, to perform our obligations to you and to develop, improve and personalize our service; to ensure marketplace integrity and security; to prevent fraud; to contact you and send you direct marketing communications; to promote and advertise the website, our services and the GNX marketplace; to comply with lawful requests by public authorities and to comply with applicable laws and regulations.

How long we keep your information – We will keep personal information only for as long as is required to perform the purpose for which it was collected. However, in some cases we will retain personal information for longer periods of time.

Your data protection rights – All users are entitled to the rights to access, rectification, erasure, restrict processing, object to processing and data portability.

Sharing personal information with third parties – We share personal information with third parties in order to operate the website, provide our services to you, perform obligations imposed on us by applicable laws and regulations, and prevent fraud, infringements and illegal activities.

Where we process personal information - Some of the personal information you provide to us will be stored or processed on our behalf by third party suppliers and data processors and may be located in other jurisdictions, such as the United States and Israel.

Cookies - We use cookies and similar technologies (such as web beacons, pixels, tags, and scripts) to improve and personalize your experience, provide our services, analyze website performance and for marketing purposes.

External links - the website contains links to third party sites and if you link to a third party site from the website, any data you provide to that site and any use of that data by the third party are not

under the control of GNX and are not subject to this Policy.

**Security** – We implement technical and organizational measures to maintain the security of the website and your personal information and in preventing unauthorized access, loss, misuse, alteration, destruction or damage to it through industry standard technologies and internal procedures.

**Specific provisions for EU, EEA and UK Users** – If you are an EU, EEA or UK user, you are entitled to receive further information on our processing and your rights as a data subject, as detailed below.

**Specific provisions for US residents** – If you are a US resident, depending on where you live, and subject to certain exceptions, you are entitled to specific privacy rights as detailed below.

**Changes to our privacy policy** – GNX regularly reviews and updates this policy.

**Updating personal information** – We take steps to ensure that the personal information we collect is accurate and up to date, and we provide you with the opportunity to update your information through your account profile settings. In the event that you believe your information is in any way incorrect or inaccurate, please let us know immediately.

**Contact us** - You can exercise your rights over your personal information, by contacting us at [privacy@gnx.net](mailto:privacy@gnx.net). More details about the rights applicable to you are in the long version of the Policy.

**Contact the appropriate authority** – Contact information for the Dutch Data Protection Authority (Autoriteit Persoonsgegevens)

The above are just the highlights. We encourage you to read more about the information we collect, how we use it, understand the meaning of cookies (no, you can't eat it) and more in the detailed version of our Policy below.

## The information we collect

GNX collects the following data:

- personal identification information (name, email address, phone number, location, company, job role, etc.);
- content of messages, inquiries or requests submitted to us such as through our website or through email; and
- IP address(es), cookie identifier(s) and/or location data.

### Information you provide:

Most of the data we collect is information you provide to us, directly. We collect data and process data when you:

- register online or place an order for any of our services;
- communicate with us by way of any message, inquiry or request through our website forms, email, social media or otherwise;
- use or view our website via your browser's cookies;
- interact with links across our services including in emails from us;

### Information we collect automatically:

**Device Information.** We may also collect information from and about the devices you use to access our website:

- Information about your connection, such as your IP address, browser type and language; operating system; the referring webpage; access times; pages visited; location; your mobile carrier; device information (including device and application IDs); search terms and IDs (including those not submitted as queries); and identifiers associated with cookies. We also receive log information when you click on, view, or interact with links on our website.
- Information about your device and its settings, such as device and advertising ID, operating system, carrier, language, memory, apps installed, and battery level.

Location Information. When you use our website, we collect some information about your approximate location to provide the service you expect.

Log Information. We may receive information when you view content on or otherwise interact with our website or services, such as:

Cookies and similar technologies. Like many websites, we use cookies and similar technologies to collect additional website usage data and to operate our services. We use cookies to personalise content and ads, to provide social media features and to analyse our traffic. We also share information about your use of our site with our social media, advertising and analytics partners who may combine it with other information that you've provided to them or that they've collected from your use of their services.

Information we receive from third parties:

GNX may also receive your data indirectly from the following sources:

- Ad Partners, Developers, Publishers
- Other Third Parties, Account Connections, and Integrations.

## The legal bases upon which we collect your data

Where relevant under applicable laws, all processing of your personal information will be justified by a "lawful ground" for processing. In the majority of cases, processing will be justified on the legal basis that:

- you have provided your consent for us to use your personal information for a specific purpose;
- our use of your personal information is necessary to perform a contract or take steps to enter into a contract with you (e.g. to provide you with services which you have purchased);
- the processing is necessary to comply with a relevant legal obligation or

regulatory obligation that we have (e.g. fraud prevention); or

- the processing is necessary to support our legitimate interests as a business (e.g. to improve our services to you), subject to your overriding interests and fundamental rights and provided it is conducted at all times in a way that is proportionate.

## How we will use your information

GNX collects your data so that we can:

- process orders and manage accounts;
- email special offers on other products and services we think you might like;
- retain your use details to make suggestions in which we believe you may also be interested;
- retain and evaluate information on your recent visits to our website and how you move around different sections of our website for analytics purposes to understand how people use our website so that we can make it more intuitive;
- keep a record of the articles on our website that you have clicked on and use that information to target advertising on this website to you that is relevant to your interests, which we have identified based on articles you have read.

We will also use your personal information for the following purposes:

- to provide you with quality service and security, to operate the website, to fulfill our obligations to you and to develop, improve and personalize our service. For example, we use personal information to verify your identity. We also use this information to establish and set up your account, verify or re-issue a password, log your activity, enable your communications with other members, provide customer support and contact you from time to time. The information helps us to develop and improve our services, to understand and analyse our performance as well as your preferences and performance and to customize and

personalize our service and enhance your experience.

- to ensure marketplace integrity, prevent fraud and maintain a safe and secure marketplace and services. For example, we use personal information to monitor, track and prevent illegal, fraudulent and inappropriate activities, monitor content integrity, conduct security investigations and risk assessments, verify or authenticate information provided by you, investigate reports and complaints about users, enforce our Terms of Service and comply with applicable laws. We conduct certain behavioural analytics to achieve the above objectives and in limited cases, if we detect activity that we think poses a risk to the GNX marketplace, other users, our community, or third parties, automated processes may restrict or limit your ability to use GNX. If you would like to challenge any such decision, please contact us at [contact@gnx.net](mailto:contact@gnx.net).
- to contact you, as requested by you or as otherwise approved by you or permitted according to this Policy.
- to promote and advertise the website, our services and the GNX marketplace. For example, we use the information collected from you for the purpose of sending direct marketing messages (as detailed below), to show you information that may be of interest to you, to organize and facilitate referral programs, contests or other promotional activities or events.
- to maintain appropriate business records, to comply with lawful requests by public authorities and to comply with applicable laws and regulations.

We will ask for your consent before using information for a purpose other than those set out in this Policy.

## Marketing

GNX may send you information about products and services of ours that we think you might like, as well as those of our partner companies.

If you have agreed to receive marketing, you may always opt out at a later date.

You have the right at any time to stop GNX from contacting you for marketing purposes or giving your data to other members of the GNX Group.

### Direct marketing:

- We use your personal information to send you direct marketing communications about our products, services or promotions from GNX that may be of interest to you or our related services. This may be via email, post, SMS, telephone or targeted online advertisements.
- Our processing of your personal information for marketing purposes is based on our legitimate interest, on your consent, or on other legal bases as permitted by applicable laws. You have a right to prevent direct marketing of any form at any time - this can be exercised by following the opt-out link found at the bottom-left of our website as well as on all of our communications.
- We take steps to limit direct marketing to a reasonable and proportionate level, and to send you communications which we believe may be of interest or relevance to you, based on the information we have about you.

This Site is also protected by reCAPTCHA. The Google Privacy Policy and [Terms of Service](#) apply with respect to data collected by reCAPTCHA. The use of Google reCAPTCHA is required in order to prevent fraud and misuse of the website by use of automated machines. To learn more please see [Google's privacy policy](#).

If you agree to allow GNX to share your data with our partner companies, they may offer you their products and services.

When GNX processes your order, it may send your data to, and also use the resulting information from, credit reference agencies to prevent fraudulent purchases.

## How long we keep your information

We apply a general rule of keeping personal information only for as long as is required to perform the purpose for which it was collected. However, in some circumstances, we will retain your personal information for longer periods of time. We will retain personal information in the following manners:

- as long as it is necessary and relevant for our operations, e.g. so that we have an accurate record of your dealings with us in the event of any complaints or challenges;
- in relation to personal information from closed accounts to comply with applicable laws, prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigation, enforce our Site terms and take other actions as permitted by law;
- to comply with statutory or other obligations to which GNX is subject to; and
- if and to the extent necessary, we need it to preserve evidence within the statutes of limitation.

## Your data protection rights

GNX would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access - You have the right to request GNX for copies of your personal data. We may charge you a small fee for this service.

The right to rectification - You have the right to request that GNX correct any information you

believe is inaccurate. You also have the right to request GNX to complete information you believe is incomplete.

The right to erasure - You have the right to request that GNX erase your personal data, under certain conditions.

The right to restrict processing - You have the right to request that GNX restrict the processing of your personal data, under certain conditions.

The right to object to processing - You have the right to object to GNX's processing of your personal data, under certain conditions.

The right to data portability - You have the right to request that GNX transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email:

Call us at: [+31 30 227 3500](tel:+31302273500)  
Or email us at: [contact@gnx.net](mailto:contact@gnx.net)  
Or write to us: GNX BV  
Herengracht 124  
1015 BT  
Amsterdam  
The Netherlands

## Cookies

### What are cookies?

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

### How do we use cookies?

GNX uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in;
- Understanding how you use our website;
- Operate and improve our website; and
- Marketing purposes



## What types of cookies do we use?

There are a number of different types of cookies, however, our website uses:

**Functionality** – GNX uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.

**Advertising** – GNX uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. GNX sometimes shares some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.

**Analytical** – GNX uses these cookies to collect anonymous information about the use of our website. The information is used only to improve our website's quality and functionality.

## How to manage cookies?

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

## External links and privacy policies of other websites

The GNX website may contain links to other websites of third parties. Our privacy policy applies only to our website. If you click on a link or navigate to another site from our website, you should read the privacy policy of that website. Any data you provide to that site and any use of that data by the third party are not under the control of GNX and are not subject to this Policy. You should consult the privacy policies of each site you visit. This Policy applies solely to personal information collected by our website. If you upload content, including personal information, to a social network and then tag the

website, your submission will be subject to that social network's terms of use and privacy policy, even where you post on an official GNX page on the social network. We do not have control over these terms of use and privacy policies and have not reviewed their adequacy. You should therefore review these before submitting any personal information.

## Sharing information with third parties

We share your personal information with third parties as detailed below:

**With Service Providers.** We share personal information for business purposes with service providers that provide us with services for the purpose of operating the Site, opening and operating your account as well as providing ancillary services and solutions. These include, among others, hosting services, billing and payment processors and vendors, fraud detection and prevention services, CRM systems, forum hosting, community management services, data and cybersecurity services, web analytics and performance tools, translation tools, IT SaaS services, session recording, communication systems, mailing systems, data optimization and marketing services, data enrichment services, legal and financial advisors and technical consultants. Consistent with applicable legal requirements, we take appropriate technical and organizational measures to require third parties to adequately safeguard personal information and only process it in accordance with our instructions;

**For legal reasons.** We share personal information with law enforcement agencies, public authorities or other parties in order to respond to a subpoena or court order, judicial process or to regulatory authorities, if we believe we are required to do so by law, or that doing so is reasonably necessary to comply with legal processes; when we believe it necessary or appropriate to disclose personal information to law enforcement authorities, such as to investigate actual or suspected fraud or violations of law, breaches of security, or breaches of this Policy; to respond to claims against us; and to protect the rights, property, or personal safety of GNX, our customers, or the public;

For fraud detection. We may share information with fraud detection agencies and similar third parties for the purpose of securing the website and protecting it against fraud, unauthorized transactions (such as money laundering), claims or other liabilities;

With our corporate affiliates. We share personal information with GNX's corporate affiliates for business and operational purposes, including for the purpose of operating our and our affiliates' business, providing supplemental services to you, preventing fraud and maintaining safe and secure services, promoting our and our affiliates' services and for other purposes listed herein; and

In the context of a corporate transaction. Personal information will also be disclosed if we go through a business transition such as a merger, sale, transfer of all or a portion of GNX's assets, acquisition, bankruptcy or similar event. In the event that we sell any business or assets, we will disclose your data to the prospective buyer. If we or substantially all of our assets are acquired by a third party, information held by us about our users will be one of the transferred assets

## Security

We implement technical and organizational measures in order to maintain the security of the website, our services and personal information and in preventing unauthorized access, loss, misuse, alteration, destruction or damage to it through industry standard technologies and internal procedures. Among other things, we contractually ensure that any third party processing your personal information equally provides for confidentiality and integrity of your data in a secure way. However, the transmission of data via the internet is not completely secure, and although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to the website. Once we have received your data, we will use strict procedures and security features to try to prevent unauthorized access.

Users who have registered to the website agree to keep their password in strict confidence and not disclose such password to any third party.

Further information about our data security practices can be provided on request.

## Where we process your information

Some of the personal information you provide to us will be stored or processed on our behalf by third party suppliers and data processors and may be located in other jurisdictions whose laws may differ from the jurisdiction in which you live. Whether to third parties or internally, there are also transfers of personal information from the European Economic Area ("EEA") to countries outside of the EEA not deemed to provide an adequate level of data protection from a European data protection perspective, such as the United States. With regard to data transfers to such recipients outside of the EEA we provide appropriate safeguards, in particular, by way of entering into European Union (EU) standard contractual clauses as amended from time to time, and/or equivalent data transfer safeguards. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Policy.

## Geographical specific provisions

### EU EEA and UK users

This section of the Policy applies to you if you are in the EU, the European Economic Area (EEA) or UK.

The Controller (within the meaning of the EU and UK General Data Protection Regulation ("GDPR")) for the processing of personal data as described in this Privacy policy is: GNX BV, Herengracht 124, 1015 BT Amsterdam, The Netherlands.

Under applicable EU regulation, you have the following rights in respect of your personal information:

- to obtain information about how and on what basis your personal information is processed and to obtain a copy;
- to rectify inaccurate personal information;

- to erase your personal information in limited circumstances where (a) you believe that it is no longer necessary for us to hold your personal information; (b) we are processing your personal information on the basis of legitimate interests and you object to such processing, and we cannot demonstrate an overriding legitimate ground for the processing; (c) where you have provided your personal information to us with your consent and you wish to withdraw your consent and there is no other ground under which we can process your personal information; and (d) where you believe the personal information we hold about you is being unlawfully processed by us;
- to restrict processing of your personal information where: (a) the accuracy of the personal information is contested; (b) the processing is unlawful but you object to the erasure of the personal information; (c) we no longer require the personal information for the purposes for which it was collected, but it is required for the establishment, exercise or defense of a legal claim or (d) you have objected to us processing your personal information based on our legitimate interests and we are considering your objection;
- to object to decisions which are based solely on automated processing or profiling;
- where you have provided your personal information to us with your consent, to ask us for a copy of this data in a structured, machine-readable format and to ask us to share (port) this data to another data controller; or
- to obtain a copy of or access to safeguards under which your personal information is transferred outside of the EEA.

Under certain circumstances, you may have the right to object, on grounds relating to your particular situation, to the processing of your personal data by us and we may be required to

no longer process your personal data. Moreover, if your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing. In this case your personal data will no longer be processed for such purposes by us.

In addition to the above, you have the right to lodge a complaint with a supervisory authority for data protection. Please note that the right of access and the right to erasure do not constitute absolute rights and the interests of other individuals may restrict your right of access or erase in accordance with local laws.

We will ask you for additional data to confirm your identity and for security purposes, before disclosing data requested by you. We reserve the right to charge a fee where permitted by law. We will decline to process requests that jeopardize the privacy of others, are extremely impractical, or would cause us to take any action that is not permissible under applicable laws. Additionally, as permitted by applicable laws, we will retain where necessary certain personal information for a limited period of time for record-keeping, accounting and fraud prevention purposes.

## US users

This section of the Policy applies to you, if you are a US resident, depending on where you live and subject to certain exceptions.

During the last twelve (12) months we have collected the following categories of personal information from users:

- Information that you chose to upload or otherwise provided by you to GNX, which may include: (i) Identifiers and personal information, such as name, postal addresses, online identifiers, email addresses, passport number or driving license number, social security number; (ii) characteristics of protected classifications, such as gender; facial image; audio, electronic or similar information; (iii) professional or employment-related information;



(iv) education information; (v) commercial information; (vi) Audio or other sensory information, for example if you provide audio-based services on GNX.

- Information we collect when you use GNX, including (i) Identifiers and personal information, such as online identifiers, internet protocol (IP) addresses, access device and connection information such as browser type, version, and time zone setting and browser plug-in types and versions; (ii) commercial information, including products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies; (iii) Internet or other electronic network activity information, including, but not limited to log-in and log-out time, the duration of sessions, the content uploaded and downloaded, viewed web-pages or specific content on web-pages, activity measures; (iv) Location information.
- Information that we collect or receive from third parties, such as service providers, advertisers, and third-party accounts you link with GNX, including: (i) Identifiers and personal information, such as name, online identifiers, email addresses, internet protocol (IP) addresses, access device and connection information such as browser type, version, and time zone setting and browser plug-in types and versions; (ii) Professional or employment-related information; (iii) Internet or other electronic network activity information, including, but not limited to log-in and log-out time, the duration of sessions, the content uploaded and downloaded, viewed web-pages or specific content on web-pages, activity measures; (iv) Commercial information; and (v) Location information.
- Inferences drawn from any of the information identified above to create a profile about you.

We use the personal information that we collect or receive for the business purposes as described above under the Section titled “How we will use your information.”

We may disclose the above listed categories of personal information to third parties for business purposes as described above under the Section titled “Sharing personal information with third parties” in the Privacy Policy. In the preceding twelve (12) months, we have disclosed all the categories of personal information detailed above for business purposes.

You are entitled to the following rights subject to certain exceptions, in relation to personal information related to you:

- You have a right to request access to the personal information we have collected about you over the past 12 months, including: (i) the categories of personal information we collect about you; (ii) the categories of sources from which the personal information is collected; (iii) the business or commercial purpose for collecting your personal information; (iv) the categories of third parties with whom we have shared your personal information; (v) the specific pieces of personal information that we have collected about you.
- You have a right to request that we delete personal information related to you that we collected from you under certain circumstances and exceptions.
- You have a right to correct the personal information with which you have provided us.
- You have a right to opt out of selling your personal information.
- You have a right to opt out of targeted advertisement.
- You also have a right not to be discriminated against for exercising your rights.
- You also have a right to submit your request via an authorized agent. If you

use an authorized agent to submit a request to access or delete your personal information on your behalf, the authorized agent must: (1) be a person or business entity registered with the relevant Secretary of State to conduct business in relevant state; (2) provide proof of such registration; and (3) provide documentation or other proof indicating that they are authorized to act on your behalf. We may also require you to verify your identity directly with us, and directly confirm with us that you provided the authorized agent permission to submit the request.

## Changes to our privacy policy

GNX keeps its privacy policy under regular review. The last updated can always be found on the GNX website. This privacy policy was last updated in March 2024.

## Updating personal information

We take steps to ensure that the personal information we collect is accurate and up to date, and we provide you with the opportunity to update your information through your account profile settings. In the event that you believe your information is in any way incorrect or inaccurate, please let us know immediately. We will make sure we investigate the matter and correct any inaccuracies as quickly as possible where necessary or give you ways to update it quickly or to delete it - unless we have to keep that information for legitimate business or legal purposes. When updating your personal information, we will ask you to verify your identity before we can act on your request. If for any reason you have a problem with deleting your personal information, please contact GNX's Customer Support and we will make reasonable efforts to delete any such information pursuant to any applicable privacy laws.

## How to contact us

If you have any questions about GNX's privacy policy, the data we hold about you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Call us at: [+31 30 227 3500](tel:+31302273500)  
Or email us at: [contact@gnx.net](mailto:contact@gnx.net)  
Or write to us at: GNX BV,  
Herengracht 124  
1015 BT  
Amsterdam  
The Netherlands

## How to contact the appropriate authority

Should you wish to report a complaint or if you feel that GNX has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office.

Telephone: +31 0(88) - 1805 250  
Address: Dutch Personal Data Authority  
(Autoriteit Persoonsgegevens)  
PO Box 93374, 2509 AJ The  
Hague, The Netherlands