PRIVACY POLICY

CIRCULAR IN MOTION

1. **Introduction – identification of the data controller**

Circular In Motion B.V., having its registered seat at 5913AB Venlo (The Netherlands), Kaldenkerkerweg 27, with KvK (company registration) number 78636361 (hereinafter "CIM BV", "we" or "us"), operates the digital platform "Circular In Motion", including every web page belonging to the "cirinmo.com" domain (hereinafter "Website"), including any and all desktop, tablet and mobile applications and application program interfaces (hereinafter "Applications") and any and all services offered through said digital platform, including Website and Applications, by CIM BV. Our digital platform, including Website, Applications and all services offered through our digital platform, including Website and Applications, are hereinafter jointly referred to as "Cirinmo".

CIM BV undertakes to comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the "General Data Protection Regulation", hereinafter referred to as the "GDPR"). The GDPR can be consulted at any given time via: https://eur-lex.europa.eu/eli/reg/2016/679/oj.

Since with Cirinmo, we only target businesses – so mostly but not exclusively *legal* persons – active in the circular economy, it is perfectly possible that none of the data you register via Cirinmo might lead to the identification of you as a *natural* person; data that only enables to identify a legal person are not considered personal data under the GDPR. Hence, the present Privacy Policy does not apply to such non-personal data. However, since there are different circumstances where the data you register via Cirinmo might well lead to the identification of you as a natural person, CIM BV undertakes to treat such data GDPR-proof, in accordance with the terms of the present Privacy Policy.

Since CIM BV determines the purposes and means of the processing of such personal data, CIM BV is to be considered as the "data controller" of the personal data collected via Cirinmo.

This Privacy Policy explains the reason for the processing of your personal data, how we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of us being the data controller with whom you may exercise your rights, as well as the contact details of the relevant data protection authorities.

2. **What personal data do we process?**

At present, we only process personal data that you provide us yourself.

We assign personal data to you for – in general – the use of and communication with regard to Cirinmo, including – especially – the purposes as enlisted under article 3 of this Privacy Policy.

3. **For what purposes and on what legal ground(s) do we collect and process your personal data?**

Via Cirinmo, we collect and process the following personal data, for the following purposes, based on the following legal grounds:

Purpose	Personal data collected and processed	Legal ground(s)
To respond to all sorts of enquiries with regard to Cirinmo submitted via the contact form on the Website or via info@cirinmo.com.	Contact name, E-mail, Company name. (Optional: Phone number.)	GDPR, Art. 6(1)(f): processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, and there is no prejudice to the interests or fundamental rights and freedoms of the data subject.
To send updates about Cirinmo and the Cirinmo newsletter to non-Users.	E-mail.	GDPR, Art. 6(1)(a): the data subject has given consent to the processing of his or her personal data for one or more specific purposes.
To register for the creation of a User Account.	Company name, E-mail.	GDPR, Art. 6(1)(f): processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, and there is no prejudice to the interests or fundamental rights and freedoms of the data subject; GDPR, Art. 6(1)(b): processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
To create a User Account.	Company name, E-mail, Address, Vat N° or Tax Identification N° or Company Registration N°, Billing Currency. (Optional: Phone Number, Timezone).	GDPR, Art. 6(1)(f): processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, and there is no prejudice to the interests or fundamental rights and freedoms of the data subject; GDPR, Art. 6(1)(b): processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
To receive notifications about (1) new Offers, Demands and Proposals made by other Users of Cirinmo and/or (2) changes	E-mail, Phone number.	GDPR, Art. 6(1)(a): the data subject has given consent to the processing of his or her

to Offers, Demands and Proposals you are involved in (as a Supplier or Bidder).		personal data for one or more specific purposes.
To provide other Users with the necessary information to identify you on the platform.	Company name, Address.	GDPR, Art. 6(1)(f): processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, and there is no prejudice to the interests or fundamental rights and freedoms of the data subject; GDPR, Art. 6(1)(b): processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
To construe the value chain (= for the purpose of tracing the origin of the materials traded).	Company name, Address.	GDPR, Art. 6(1)(f): processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, and there is no prejudice to the interests or fundamental rights and freedoms of the data subject.
To create log files for internal monitoring and the creation or reports.	E-mail.	GDPR, Art. 6(1)(f): processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, and there is no prejudice to the interests or fundamental rights and freedoms of the data subject.
To respond to all sorts of enquiries with regard to Cirinmo via the "LiveChat" application on Cirinmo or via support@cirinmo.com.	Contact name, E-mail.	GDPR, Art. 6(1)(f): processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, and there is no prejudice to the interests or fundamental rights and freedoms of the data subject.
To send updates about Cirinmo to Users (including but not limited to new applications and updates to the platform, upcoming changes to prices and new versions of the Terms of Use and the present Privacy Policy).	E-mail.	GDPR, Art. 6(1)(f): processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, and there is no prejudice to the interests or fundamental rights and freedoms of the data subject.

For billing and invoicing purposes.	Company name, Address, Vat N° or Tax Identification N° or Company Registration N°, Billing Currency, E-mail.	GDPR, Art. 6(1)(b): processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
To execute and enforce compliance with the provisions of the Terms of Use and the present Privacy Policy.	Contact name, Company name, E-mail, Address, Phone number, Vat N° or Tax Identification N° or Company Registration N°.	GDPR, Art. 6(1)(b): processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. GDPR, Art. 6(1)(f): processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, and there is no prejudice to the interests or fundamental rights and freedoms of the data subject.

4. How long do we keep your personal data?

Without prejudice to the exercise of your rights as referred to under article 6 of the present Privacy Policy, and unless we are required by law to keep your personal data for a longer period of time and/or unless such longer retention period is necessary for the establishment, execution or substantiation of a legal claim, we store and keep your personal data for as long as your Account is active. Upon deactivation of your Account (on your request or on our own initiative (after at least one year of inactivity or as a consequence of a breach of our Terms of Use), we will delete all your personal data from our records, except for:

- In our (encrypted) database: your Company Name (= the last name registered at the time of deactivation), linked to a unique identifier which enables us to reactivate your Account (including to recall all of your past Transactions on Cirinmo) when requested;

- In the blockchain: your Company Name and Address, stored in the blockchain registering the value chain, which is by definition unchangeable due to its (blockchain) nature;

- In accounting documents: your Company name, Address, Vat N° or Tax Identification N° or Company Registration N°, Billing Currency and E-mail, and this for a period of 7 years as from the closing of the financial year during which the relevant accounting document was created.

5. How do we protect and safeguard your personal data?

We have put in place appropriate technical and organisational measures to protect your personal data against loss, misuse and unlawful processing. These measures include (1) secure communication of

data using https, (2) storage of your personal data in an encrypted database and (3) servers protected with industry standard anti-malware, virus killers and other protection software.

6. Who has access to your personal data and to whom is it disclosed?

Access to your personal data is provided to CIM BV's staff on a "need to know" basis.

Your personal data will not be transferred to any third party without your consent, except for:

- technical service provider(s) of Cirinmo;
- Cirinmo's payment service provider, currently being "Stripe" (Stripe, Inc., Stripe Payments Europe, Ltd. and/or their affiliates; www.stripe.com);
- affiliated legal entities;
- our general and legal successors in title;
- to the extent and for the purpose we may be required to do so by law.

7. What are your rights and how can you exercise them?

As a data subject, you have specific rights under the GDPR, in particular the right to:

- access your personal data;
- amend your personal data;
- object to the processing of your personal data;
- limit the processing of your personal data;
- have your personal data deleted;
- withdraw your consent.

Where applicable, you also have the right to data portability.

You can exercise your rights by contacting CIM BV in written by e-mail or by ordinary letter using the contact details as adopted below under article 9 of the present Privacy Policy. Please indicate clearly which of the abovementioned rights you want to exercise.

8. Complaints

Should you have any complaints about the processing of your personal data, please don't hesitate to contact us.

Any complaint may also be filed at any given time with the following Data Protection Authorities:

- The Dutch "Autoriteit Persoonsgegevens" (to be considered as the "Lead Supervisory Authority" in case of cross-boarder processing of your personal data, given our "main establishment" being in The Netherlands):

  Autoriteit Persoonsgegevens
  Bezuidenhoutseweg 30
  P.O. Box 93374
  2509 AJ Den Haag/The Hague
  The Netherlands
  Phone number: +31 70 888 8500
  Fax number: +31 70 888 8501

Website: https://autoriteitpersoonsgegevens.nl

Contact: https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/gebruik-uw-privacyrechten/klacht-melden-bij-de-ap

- Your own national Data Protection Authority:

Contact details per country: https://edpb.europa.eu/about-edpb/board/members_en

9. **General contact information**

Circular in Motion B.V.

Kaldenkerkerweg 27
5913 AB, Venlo
The Netherlands

Phone number: +31 (0) 85 48 54 120

E-mail: privacy@cirinmo.com

Version and date of this Privacy Policy:
Version n°2
January 11, 2021