Privacy and Data Protection Policy

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This Privacy and Data Protection Policy outlines how baseworks.tech ("we," "us," or "our") collects, processes, and protects your personal data in accordance with the General Data Protection Regulation (GDPR) EU.

This Policy also applies to the baseworks.tech online shop at https://shop.baseworks.tech, including browsing the shop, creating or using a customer account, placing or managing an order, requesting a return or refund, and communicating with us about a purchase. The online shop is hosted by Shopify. References in this Policy to our “services” include both our existing products and services and the online shop.

baseworks.tech is the controller of personal data processed for our own purposes as described in this Policy. Certain providers, including Shopify and payment providers, may act as separate controllers where they independently determine the purposes and means of particular processing. Their processing is governed by their own privacy notices.

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Section 1: Identity and Contact Details of the Data Controller

The data controller (henceforth also referred to as the "company") responsible for the processing of your personal data is:

baseworks.tech registered in the Netherlands under Chamber of Commerce number (KvK nummer) 98170643, VAT number (btw-id) NL005312934B1, postal address: Box E1586, Oder 20, 2491DC Den Haag, Netherlands.

If you have any questions, requests or complaints about this policy or our data practices, please contact us at:

privacy@baseworks.tech

Section 2: Contact Details for Data Protection

For any data protection inquiries which fall under the GDPR (EU), please contact our Privacy Team at the contact details provided in Section 1 of this policy.

Section 3: What Personal Data We Collect

As a baseline, we collect and process the following categories of **Personal data you share with us**:

- **Contact Details**: name, delivery address, measurement-site address (only in scope of the Risk Assessment product), invoice address, email address, phone number.
- **Beliefs and Preferences Data**: Data related to declared preferences and routines concerning personal beliefs (except **Special personal data**, as laid out below), along with your declared opinions about them.
- **Interaction Data**: Data concerning interactions and routines in relation to the surrounding spaces and environments with which you interact.
- **Professional Background**: Data concerning the main professional field in which you work (for example: engineering, sales, marketing etc.).
- **Usage and Telemetry Data**: Data concerning your usage, diagnostic information, device malfunction, operational performance, and system interaction with the hardware and software ecosystem.

When you visit or use our online shop at https://shop.baseworks.tech, we may additionally process order and transaction data, including products viewed, placed in your cart or purchased, order value, discounts, delivery method, transaction status, returns, refunds, cancellations, and previous transactions.

We process payment-related data necessary to complete and document a transaction, including the selected payment method, billing information, payment status, transaction reference, and limited payment instrument information made available by the payment provider. Full payment credentials are submitted directly to the relevant payment provider and are not stored by us.

If customer accounts are enabled, we may process account data such as your login identifier, account settings, saved addresses, preferences, and order history. We also process information contained in customer-service communications, reviews, return requests, warranty requests, or other messages you send us.

When you interact with our shop, Shopify and we may automatically collect device and storefront interaction data, including your IP address, browser and device type, cookie or similar identifiers, network information, pages and products viewed, search activity, cart activity, referring website, timestamps, and consent or privacy preferences.

We obtain this information directly from you; automatically from your browser or device; from Shopify; and, where applicable, from payment providers, delivery and fulfilment providers, fraud-prevention providers, and applications or integrations used to operate the shop.

Special personal data: We do **not** knowingly collect or process special categories of personal data (e.g., data revealing racial or ethnic origin, political opinions, religious beliefs, health data) unless we have a clear legal basis to do so, such as your explicit consent.

Section 4: Purposes and Legal Basis for Processing Your Data

We process personal data only where a legal basis under the GDPR applies. Depending on the purpose, we rely on your consent (Article 6(1)(a)); the necessity of performing a contract with you or taking steps at your request before entering into a contract (Article 6(1)(b)); compliance with a legal obligation (Article 6(1)(c)); or our legitimate interests, where these are not overridden by your interests, rights, and freedoms (Article 6(1)(f)).

Consent is requested separately for the particular optional purpose concerned. Accepting our Shop Terms or acknowledging this Policy is not consent to optional research, marketing, or non-essential tracking. Where we rely on legitimate interests, we identify the relevant interest and assess the necessity and proportionality of the processing and its effect on you.

The table below describes our purposes and legal bases. Where you act for a business rather than contracting with us personally, necessary processing of your business contact details and communications is based on our legitimate interest in managing that business relationship, unless a specific legal obligation applies.

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Purpose of Processing	Categories of Personal Data	Legal Basis for Processing
Conducting research into human-to-environment interaction to assess, develop, and improve our products and business strategies.	Beliefs and Preferences Data; Interaction Data; Professional Background; and any other information you voluntarily provide for the research.	Your consent (Article 6(1)(a)). Where we intentionally process special-category personal data for this research, your explicit consent under Article 9(2)(a) is also required.
Assessing the performance, safety, and functionality of hardware and software during the Risk Assessment monitoring period.	Usage and Telemetry Data; Interaction Data; and other monitoring data you explicitly agree to provide.	Your consent (Article 6(1)(a)) for optional monitoring you choose to provide.
Responding to enquiries and taking steps you request before entering into a contract, including preparing an offer or assisting with a proposed purchase.	Contact Details; Communications Data; product or service preferences; and information necessary to prepare the requested offer or purchase.	Taking steps at your request before entering into a contract (Article 6(1)(b)). For representatives of a business customer, our legitimate interest in responding to enquiries and managing that relationship (Article 6(1)(f)).
Processing payment, confirming and fulfilling an order, arranging delivery, providing order updates, and handling cancellations, returns, refunds, warranties, and purchase-related support.	Contact Details; Order and Transaction Data; Payment-related Data; Communications Data; and, where necessary, Account Data.	Performance of our contract with you (Article 6(1)(b)). Where a statutory duty requires particular processing, such as providing a legally required remedy, compliance with that legal obligation (Article 6(1)(c)). Business-representative communications are handled as described above.
Creating, authenticating, and maintaining a customer account and providing account features requested by you.	Contact Details; Account Data; Order and Transaction Data; preferences; and authentication and security information.	Performance of the account service requested by you (Article 6(1)(b)), to the extent necessary for that service. Separate security processing is described below.
Issuing invoices, maintaining financial and transaction records, administering VAT, and complying with tax, accounting,	Contact Details; billing information; Order and Transaction Data; Payment-related Data; invoice	Compliance with applicable legal obligations (Article 6(1)(c)).

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product-safety, recall, and other statutory requirements.	data; and records required by applicable law.	
Operating strictly necessary shop functionality, including secure checkout, shopping-cart storage, session management, authentication, recording privacy choices, and delivery of requested website content.	Online Identifiers; Device and Storefront Interaction Data; Account Data; cart contents; session information; and privacy preferences.	Performance of a requested service or steps requested before a contract (Article 6(1)(b)), where applicable. For essential security and technical operation, our legitimate interest in operating a secure, functional shop (Article 6(1)(f)). Recording privacy choices and evidence necessary to meet legal duties is based on compliance with those duties (Article 6(1)(c)).
Securing our website, shop, accounts, systems, products, and services; detecting and preventing fraud, abuse, malicious traffic, unauthorized scraping, and other unlawful or unsafe activity; and investigating security incidents.	Online Identifiers; Device and Storefront Interaction Data; Account Data; Order and Transaction Data; Payment-related Data; Communications Data; and relevant Usage and Telemetry Data.	Our legitimate interest in protecting customers, our business, systems and services against fraud, misuse and security incidents (Article 6(1)(f)). Where a particular legal duty requires processing, Article 6(1)(c) applies.
Responding to general customer-service enquiries and maintaining appropriate records of communications that are not necessary to perform a contract.	Contact Details; Communications Data; Account Data; and relevant Order and Transaction Data.	Our legitimate interest in answering enquiries and maintaining appropriate customer-service records (Article 6(1)(f)).
Establishing, exercising, or defending legal claims; resolving disputes; enforcing our terms and policies; and cooperating with regulators, courts, law-enforcement bodies, or other competent authorities.	Contact Details; Communications Data; Account Data; Order and Transaction Data; Payment-related Data; Online Identifiers; and any other information relevant to the matter.	Compliance with a legal obligation where disclosure or retention is legally required (Article 6(1)(c)). Otherwise, our legitimate interest in establishing, exercising or defending legal rights (Article 6(1)(f)).

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Sending promotional email or other electronic marketing communications where you have requested them.	Contact Details; marketing preferences; and information about your interactions with our communications.	Your consent (Article 6(1)(a)). You may withdraw it at any time.
Using non-essential analytics, personalization, advertising, or similar cookies and technologies, including eligible Shopify Enhanced Services where enabled.	Online Identifiers; Device and Storefront Interaction Data; cookie identifiers; consent preferences; and information about products, pages, advertisements, or communications with which you interact.	Your consent (Article 6(1)(a)) for our consent-based processing. Where applicable law requires consent for access to or storage on your device, these technologies are not used before that consent. Shopify's independent processing is described separately in Section 6.

Where we rely on legitimate interests, we assess whether the processing is necessary and balance our interests against your interests, rights, freedoms, and reasonable expectations. You may object in the circumstances described in Section 10. Where we rely on consent, you may withdraw that consent as described in Section 11. The requirements to provide information necessary for an order or a legal obligation do not make optional research, marketing or tracking a condition of purchase.

Personal data required to process payment, fulfil and deliver an order, administer a return or refund, or comply with applicable legal requirements must be provided for those purposes. If you do not provide the required information, we may be unable to accept or process your order, collect payment, deliver a product, administer a cancellation, return, refund, or warranty request, or otherwise provide the requested product or service. Information identified as optional is not required to complete a purchase or receive the relevant service.

Section 5: Data Minimization and Accuracy

We adhere to the principle of data minimization, meaning we only collect and process personal data that is strictly necessary for the purposes outlined in this policy. We take all reasonable steps to ensure the personal data we hold is accurate and up-to-date.

Section 6: Disclosure and Recipients of Your Personal Data

We disclose personal data only where necessary for the purposes and legal bases described in this Policy. We do not disclose personal data to third parties for their own direct-marketing purposes unless you have provided the consent required by applicable law.

Depending on the services you use and the transaction concerned, recipients of your personal data may include the following:

- **Shopify.** Our online shop is hosted and operated using Shopify's commerce platform. Shopify processes customer personal data on our behalf to provide services such as storefront hosting, checkout, order administration, payment functionality, security, fraud prevention, analytics, and customer-account features. When Shopify processes personal data on our documented instructions for these purposes, baseworks.tech acts as the controller and Shopify acts as our processor under the Shopify Data Processing Addendum.
- **Payment providers and financial institutions.** We disclose the information necessary to process and confirm payments, issue refunds, handle chargebacks, prevent fraud, and comply with financial or regulatory requirements to the payment providers you choose during the checkout process or according to the instructions you provide us and the banks, card networks, or other financial institutions involved in the transaction. Full payment credentials are submitted directly to the relevant payment provider and are not stored by us. A payment provider may act as a separate controller where it independently processes personal data to comply with legal obligations, prevent fraud, or operate its payment services. Its own privacy notice applies to that processing.
- **Delivery, fulfilment, and logistics providers.** We disclose your name, delivery address, contact details, order details, and any necessary delivery instructions to the delivery or fulfillment providers that you have been informed about during the checkout process, so that your order can be prepared, shipped, delivered, tracked, returned, or recalled.
- **Technology and operational service providers.** We use service providers that support hosting, cloud storage, communications, security, fraud prevention, analytics, customer support, accounting, system administration, and other business operations. These providers include Google LLC, Amazon Web Services EMEA SARL, Shopify, and any Shopify applications or integrations identified in this Policy or our cookie notice. They may process personal data only to the extent necessary to provide the relevant service and subject to appropriate contractual, confidentiality, and security obligations.
- **Professional advisers.** We may disclose personal data to accountants, auditors, insurers, banks, lawyers, and other professional advisers where reasonably necessary to obtain professional services, comply with our obligations, manage risks, or establish, exercise, or defend legal claims.
- **Public authorities and other legally authorized recipients.** We may disclose personal data to courts, supervisory authorities, tax authorities, law-enforcement agencies, government bodies, financial institutions, fraud-prevention bodies, or other authorized recipients where disclosure is required by law or is necessary to respond to valid legal process, investigate suspected unlawful activity, protect the safety or rights of individuals, or establish, exercise, or defend legal claims.
- **Parties to a business transaction.** We may disclose relevant personal data to prospective purchasers, investors, professional advisers, or other parties involved in a merger, acquisition, financing, restructuring, insolvency, or sale of all or part of our business. Any recipient will be required to handle the information confidentially and in accordance with applicable data-protection law.
- **Recipients selected by you.** We may disclose personal data where you direct or expressly request us to do so, for example when you select a particular delivery service, payment method, social-media integration, or other third-party service. The relevant third party's privacy notice applies where it processes the information for its own purposes.

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6.1 Shopify as a Separate Controller

In some circumstances, Shopify processes personal data for purposes that it determines independently rather than solely on our instructions. This may occur when you choose to use a Shopify consumer service such as Shop or Shop Pay, or when Shopify processes information to comply with its own legal obligations, operate its consumer services, prevent fraud, or protect its platform. For such processing, Shopify acts as a separate controller and is responsible for providing information about its purposes, legal bases, retention practices, and your rights.

Further information is available in the Shopify Consumer Privacy Policy. Where Shopify acts as a separate controller, you may exercise the applicable rights directly through Shopify Privacy Controls.

6.2 Shopify Network Intelligence and Enhanced Services

We have enabled Shopify Network Intelligence and use Shopify Enhanced Services. In connection with these services, information about your interactions and transactions with our shop may be transmitted to Shopify and combined with information from your interactions with Shopify and other Shopify merchants. Shopify may process this information to provide, develop, and improve analytics, product customization, store performance, advertising, fraud prevention, and other Enhanced Services for us and other merchants.

For this processing, Shopify acts as a separate controller and independently determines its purposes, means, and applicable legal bases. Shopify may rely on consent for personalized advertising and may rely on its legitimate interests for activities such as providing and improving services, producing analytics, testing features, and supporting marketing or other communications, as explained in the Shopify Consumer Privacy Policy.

We and Shopify will use personal data for personalized advertising, and place or access non-essential cookies or similar technologies, only where the consent required by applicable law has been obtained. You may refuse or withdraw consent through the **Cookie consent** control box available in our shop. You may also use the Shopify Privacy Controls to limit Shopify's use of your personal data for advertising, request access to personal data held by Shopify, or request its deletion.

6.3 Responsibilities of Recipients

Service providers acting as our processors may process personal data only on our documented instructions, for the agreed purposes and subject to appropriate data-processing, confidentiality, and security obligations. They may use subprocessors where this is permitted by their agreements with us and applicable data-protection law.

Where a recipient acts as a separate controller, it is independently responsible for its processing and for complying with applicable data-protection law. Its privacy notice will explain how it uses personal data and how you may exercise your rights in relation to that processing.

We require recipients to receive only the personal data reasonably necessary for their role. Disclosure to a recipient does not authorize that recipient to use the information for unrelated purposes. International

disclosures and the safeguards applying to transfers outside the European Economic Area are described in Section 8.

Section 7: Cookies and Similar Technologies

Our shop uses cookies and similar technologies supplied by us, Shopify, and approved service providers. Strictly necessary technologies are used to provide functions such as secure checkout, shopping-cart storage, authentication, fraud prevention, network security, and recording your privacy choices. Where permitted by law, these technologies are used without consent because the shop cannot provide the requested functionality without them.

Our cookie preferences panel explains the categories of cookies and lets you manage optional cookies. Information about cookies supplied by Shopify, including their purposes and durations, is available in Shopify's Cookie Policy under "Merchant storefronts". The cookies used depend on the features enabled and your interactions with the shop.

Section 8: International Data Transfers

Shopify and certain other service providers may process personal data outside the European Economic Area, including in Canada, Singapore, and other countries in which their affiliates or subprocessors operate. Some of those countries may not provide the same statutory level of data protection as the EEA.

Where personal data is transferred outside the EEA, we require an applicable lawful transfer mechanism, such as an adequacy decision, approved Binding Corporate Rules, or the European Commission's Standard Contractual Clauses, together with supplementary safeguards where required. Shopify describes the mechanisms it uses in its Data Processing Addendum. You may contact us at the email address included in Section 1 of this policy to request further information about the safeguards applicable to a particular transfer.

Section 9: Data Retention

We retain personal data only for as long as necessary for the relevant purpose. Order, invoice, payment-confirmation, and related tax records are normally retained for seven years to comply with Dutch fiscal obligations. Where records fall under the EU Union or Import One Stop Shop retention rules, they may be retained for ten years.

Other order-fulfilment information is retained until delivery has been completed and applicable cancellation, return, warranty, dispute, and legal-claim periods have expired. Customer-account data is retained while the account remains active and is then deleted or anonymized unless continued retention is legally required. Customer-service correspondence is retained for as long as needed to resolve the request and any related dispute. Marketing data is processed until you withdraw consent or object, after which we may retain only the minimum suppression information necessary to honour that choice. Cookie-specific retention periods are provided in the shop's Cookie consent notice.

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When a retention period expires, we delete or irreversibly anonymize the information unless it must be preserved for an outstanding legal claim, regulatory inquiry, fraud investigation, or other legal obligation.

Section 10: Your Rights as a Data Subject

Under the GDPR, you have the following rights regarding your personal data, insofar as your personal data is directly or indirectly associated with your identity (i.e. not irreversibly anonymized):

- **The right to be informed**: You have the right to be informed about the collection and use of your personal data.
- **The right of access**: You have the right to request a copy of the personal data we hold about you.
- **The right to rectification**: You have the right to have any inaccurate or incomplete data we hold about you corrected.
- **The right to erasure ("right to be forgotten")**: You have the right to request the deletion of your personal data.
- **The right to restrict processing**: You have the right to request that we restrict the processing of your personal data.
- **The right to data portability**: You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to have it transmitted to another controller.
- **The right to object**: You have the right to object to the processing of your personal data in certain circumstances, including for direct marketing purposes.
- **Rights in relation to automated decision-making and profiling:** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

You have an unconditional right to object at any time to processing of your personal data for direct marketing purposes, including profiling related to direct marketing. After receiving such an objection, we will no longer process your personal data for those purposes.

To exercise any of these rights, please contact us at the email address referenced in Section 1 of this policy.

For security reasons, we can't deal with your request if we are not sure of your identity, so we may ask you for proof of your ID. If a third party exercises one of these rights on your behalf, we may need to ask for proof that a third party has been validly authorised to act on your behalf. When you exercise one of these rights, it may take us up to one calendar month to implement your changes. We will usually not charge you a fee when you exercise your rights. However, we are allowed by law to charge a reasonable fee or refuse to act on your request if it is manifestly unfounded or excessive.

Requests concerning processing for which baseworks.tech is the controller may be sent to the email address included in Section 1 of this policy. Where Shopify acts as a separate controller, you may also

exercise the applicable rights directly through Shopify Privacy Controls. We will assist in directing or forwarding a request where appropriate.

Section 11: Right to Withdraw Consent

Where we process personal data on the basis of your consent, you may withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal. We will stop the processing that depends on the withdrawn consent.

You can withdraw marketing consent through the unsubscribe link in our marketing messages, and change or withdraw cookie consent through the shop's Cookie preferences control. For research consent or assistance, contact us at the email address mentioned in Section 1.

Withdrawal does not prevent processing for a separate purpose that is independently supported by another applicable legal basis described in Section 4, such as retaining legally required tax records. We do not switch the same consent-based activity to another legal basis merely because you withdraw consent. Where there is no lawful reason to retain the data, we erase or anonymize it in accordance with Section 9.

Section 12: Right to Lodge a Complaint

If you're unhappy with how we've handled your request you can complain to your local data protection authority. In the Netherlands, this is the Autoriteit Persoonsgegevens (https://autoriteitpersoonsgegevens.nl/).

Section 13: Security of Your Personal Data

We are committed to ensuring that your personal data is secure. We have implemented appropriate technical and organizational measures to protect your data from unauthorized access, use, alteration, or disclosure. These measures include data encryption and access controls.

Your personal data is kept safe by us by exclusively using encrypted (at rest and in-transit) data management solutions offered by local encrypted devices, Google (safety statement, data processing addendum) and AWS (safety statement, data processing addendum). Data access is only possible by 2-step authentication in Google and MFA authentication in AWS, which we use for all our Google and AWS accounts.

Section 14: Changes to This Privacy Policy

We may update this policy from time to time. The only policy applicable at any point in time is the one with the most recent past effective date relative to today. The **latest version** will be available on our website https://baseworks.tech/. We will notify you of any significant changes by posting a new version of the policy on our website or by contacting you by email.

All personal data newly collected from the date when the policy is updated will be processed according to the **latest version** of this policy. For personal data we already hold, we will only apply the new policy to

your existing data if the new processing is compatible with the original purposes for which the data was collected, or if we have obtained your prior consent.

Section 15: Governing Language

This policy, as well as any related documents, may be translated into other languages for convenience. In the event of any discrepancies, inconsistencies, or conflicts of interpretation between the English version and the Romanian version (or any other translation), the English version shall prevail and be considered the binding legal text.

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