



GoCancel Privacy Statement

Version 1.0 – 21 October 2021

1. Introduction

This privacy statement ("**Statement**") provides information on the processing of personal data by GoCancel B.V., a company located at Gustav Mahlerlaan 1025, 1082 MK Amsterdam, registered in the Netherlands Chamber of Commerce under number 83708847 ("**GoCancel**"). Further contact details are provided at the bottom of this Statement.

This Statement applies to all personal data processed by GoCancel and/or on behalf of GoCancel ("**Users**", "**You**" or "**Your**"), based on which they may be identified or become identifiable ("**Personal Data**").

This Statement sets out the elements necessary for GoCancel's compliance with applicable privacy legislation, principles and practice, including but not limited to the General Data Protection Regulation ("**Applicable Laws**"). GoCancel reserves the right to review and/or amend the Statement periodically, in order to comply with (local and/or European Union) legislation, and for any other purpose deemed reasonably necessary by GoCancel.

Please find below an overview of the subjects which will be discussed in this Statement.

- Categories of Personal Data
- Purpose, legal ground and retention period of data processing
- Security of Personal Data
- Transfer of Personal Data
- Rights in relation to Personal Data
- Questions and inquiries

2. Categories of Personal Data



GoCancel processes certain Personal Data, depending on the subscription that is terminated. This entails that specific Personal Data are only requested if this is required by the service provider with whom you have a subscription that You want to terminate ("**Service Provider**"). GoCancel may therefore process the following Personal Data:

- First name and Last name
- Email address
- Phone number
- Address
- IBAN
- Copy of ID
- Date of birth
- Contract number
- Customer number
- Plate Number

3. Purpose, legal ground and retention period of data processing

GoCancel is processing Personal Data based on the following legal grounds and for the following purposes:

- We process Your Personal Data listed above in order to terminate the subscription You want us to terminate ("**Cancellation Services**"). Our legal ground for doing so is performance of contract.
- Because of the nature of the Cancellation Services, i.e. to terminate subscriptions, we sometimes receive special categories of personal data such as political opinion or trade union membership when you want to terminate your membership of a political party or trade union. In addition, some of the Service Providers require a copy of ID to terminate a subscription. We want to stress we only ask for a copy of your ID when this is required by Your Service Provider. Please make sure you only upload a copy of ID where your photograph and Tax Identification Number are blurred because that information is not required. Our legal ground for this processing is Your explicit consent.
- In addition, we process Your Personal Data for our legitimate interest to improve the Cancellation Services. In doing so, we ensure that the impact on Your privacy is as limited as possible, by, amongst others, aggregating Your Personal Data to the extent possible.



GoCancel will delete your personal data automatically after 6 months.

GoCancel will only process Personal Data to the extent necessary for the described purposes. If there is a need to process Personal Data for other purposes, GoCancel will only do so if such processing is compatible with the original purposes or if You give consent to such processing. GoCancel will in any event provide You with further information on such purpose prior to the further processing.

4. Security of Personal Data

GoCancel handles Personal Data carefully and uses appropriate technical and organisational measures to preserve the integrity and security of Your Personal Data. Our implemented technical and organisational include, amongst others:

- access controls, on a "need to know"-basis;
- access audit trail
- pseudonymisation.
- encryption; and
- measures that prevent reading, copying, changing or removing during the storing, processing and transporting of personal data.

5. Transfer of Personal Data

GoCancel transfers Your Personal Data – as necessary in view of the listed legal grounds – to the following recipients:

Recipient	Purpose	Privacy Statement
Mailgun	To provide our services	https://www.mailgun.com/gdpr/
AWS	The provision of the Services initiated by Customer from time to time like compute, storage and such other Services.	https://d1.awsstatic.com/legal/aws-gdpr/AWS_GDPR_DPA.pdf



Deutsche Post Dialog Solutions GmbH.	Produce and ship registered letters.	https://www.deutschepost.de/de/d/dpds/datenschutz-en.html
Aruba	To implement preliminary and subsequent actions to manage information and contact requests	https://www.arubaracing.it/b/en_informativa_arubaracing.pdf
Grafana	based on legitimate business interests	https://grafana.com/legal/data-processing-agreement/
Heroku	To provide our services	https://www.salesforce.com/content/dam/web/en_us/www/documents/legal/Agreements/data-processing-addendum.pdf
Appsignal	To develop and improve our services.	https://www.appsignal.com/privacy-policy

GoCancel does not transfer Personal Data to a third country or international organisations outside of the European union/European Economic Area ("EU/EEA") besides for Personal Data shared with Mailgun, AWS, Aruba Grafana and Sentry. Aforementioned organisations may process Your Personal Data outside the EU/EEA in third countries. These transfers of Personal Data only take place in compliance with the Applicable Laws and where appropriate safeguards are in place that ensure the level of protection of Data Subjects as required by these Applicable Laws (e.g. transfers on the basis of EU Model clauses).

6. Rights in relation to Personal Data

Data Subjects have the right of information, access, rectification, addition and erasure of Personal Data, and the right to object against or restrict the processing of Personal Data (or withdraw an earlier



given consent), as well as the right to data portability. The procedure of GoCancel that enables Data Subjects to exercise these rights, is described below.

Data Subjects may file a request to access Personal Data processed by GoCancel and GoCancel shall respond as soon as possible, and in any event within one (1) month, about:

- a) whether GoCancel holds any Personal Data relating to You; and,
- b) provide information on the purposes of the processing, the categories, the recipients (if applicable) the envisaged period for which the Personal Data will be stored, or the criteria used, the existence of the right to request rectification, erasure, restriction or to object to such processing, the right to lodge a complaint with a supervisory authority, the appropriate safeguards and the source(s) of the Personal Data.

GoCancel will comply with a legitimate request of a Data Subject for rectification, addition and erasure, if the Personal Data are factually incorrect, incomplete, or irrelevant for the purpose(s) of the data processing, or otherwise processed in violation with the Applicable Laws.

GoCancel informs the Data Subject within one (1) month after receiving the request whether the request shall be complied with (in time), and if not, accompanied with the reasons for the delay or rejection. Information provided shall be free of charge. Data Subjects can exercise these rights at reasonable intervals. Data Subjects can exercise their rights by contacting the Privacy contact person in writing or per e-mail at (see address below).

Please note GoCancel may at times be unable to fully comply with a request to erase Personal Data. This is because of compliance with legal obligations such as to comply with a law enforcement request or because such information is needed for the exercise of legal claims.

7. Questions and inquiries

For queries and about this Statement of GoCancel or complaints, please contact the privacy point of contact: privacy@Gocxl.com.



If you are unhappy with the way we treat your complaint you may file a complaint with the relevant Data Protection Authority.

Country	Data Protection Authority	Website
Netherlands	Autoriteit Persoonsgegevens	https://autoriteitpersoonsgegevens.nl/
France	Commission Nationale de l'Informatique et des Libertés	https://www.cnil.fr/
Italy	Garante per la protezione dei dati personali	https://www.garanteprivacy.it/home
Spain	Agencia Española de Protección de Datos	https://www.aepd.es/es