

# Privacy Policy

Greenpill Technologies  
C.o.C. The Netherlands 88455483  
Koningin Wilhelminaweg 21,  
8443 EJ Heerenveen, The Netherlands  
info@greenpill.tech  
greenpill.tech

Last Updated: June 26, 2025

## 1. Introduction

Greenpill is committed to protecting the privacy and security of your personal data. This Privacy Policy explains how we handle your information when you interact with our services, website, or otherwise engage with us. We process personal data in a lawful, fair, and transparent manner, ensuring that your rights are respected.

## 2. What Personal Data Do We Collect?

We may collect various types of personal data, depending on your interaction with us. This may include:

Contact Information: Name, email address, phone number, postal address.

Identification Data: (If applicable and necessary for specific services) date of birth, nationality.

Technical Data: IP address, browser type and version, operating system, device information, website usage data (e.g., pages visited, time spent on site), cookies and similar technologies.

Professional Data: (If applicable, e.g., for B2B clients or job applicants) company name, job title, professional contact details.

Communication Data: Records of your correspondence with us (e.g., emails, chat logs, customer service interactions).

Financial Data: (If applicable, e.g., for payments) bank account details, payment card information (though typically processed by third-party payment processors, not stored directly by us).

Other Information you provide: Any other information you voluntarily provide to us through forms, surveys, or other interactions.

## 3. How and Why Do We Process Your Personal Data? (Legal Bases and Purposes)

We process your personal data for specified, explicit, and legitimate purposes, relying on the following legal bases as permitted by the GDPR:

Performance of a Contract:

To provide the services or products you have requested from us.

To manage your account and process payments.

To communicate with you regarding your service or product.

Legal Obligation:

To comply with legal and regulatory obligations, such as tax laws, anti-money laundering regulations, or reporting requirements.

To respond to lawful requests from public authorities.

Legitimate Interests:

To improve our services and website based on usage patterns and feedback.

To conduct internal business operations, such as data analysis, troubleshooting, and system maintenance.

To prevent fraud and ensure the security of our systems.

To send you marketing communications about our products and services that we believe may be of interest to you, where permitted by law and after conducting a legitimate interests assessment. You will always have the

right to object to such processing.

To defend our legal rights and interests.

Consent:

Where required by law, we will obtain your explicit consent for specific processing activities, such as sending certain types of marketing communications or using non-essential cookies. You have the right to withdraw your consent at any time.

#### 4. How Long Do We Retain Your Personal Data?

We will retain your personal data for no longer than is necessary for the purposes for which it was collected, or as required by law. The retention period will vary depending on the type of data and the purpose of processing. For example:

Contractual data: retained for the duration of the contract plus a period to cover any legal claims.

Marketing consent data: retained until you withdraw your consent or object to processing.

Legal compliance data: retained for the period mandated by relevant laws.

Once the retention period expires, we will securely delete or anonymize your personal data.

#### 5. Who Do We Share Your Personal Data With?

We may share your personal data with the following categories of recipients, always ensuring appropriate safeguards are in place:

Service Providers: Third-party companies that provide services on our behalf, such as IT support, hosting, payment processing, marketing, and analytics. These providers are contractually obligated to protect your data and only process it according to our instructions.

Professional Advisors: Lawyers, accountants, and other professional advisors who require access to your data to provide their services.

Public Authorities: Law enforcement agencies, regulatory bodies, or other governmental organizations when required by law or to protect our legitimate interests.

Affiliated Companies: If Greenpill has affiliated companies, your data may be shared within our corporate group for internal administrative purposes, provided appropriate safeguards are in place.

Business Transfers: In the event of a merger, acquisition, or sale of all or a portion of our assets, your personal data may be transferred to the acquiring entity.

#### 6. International Data Transfers

As a Dutch company, we primarily store and process your personal data within the European Economic Area (EEA). If we transfer personal data to countries outside the EEA, we will ensure that adequate safeguards are in place to protect your data, such as:

Transferring to countries deemed to provide an adequate level of data protection by the European Commission.

Using standard contractual clauses approved by the European Commission.

Obtaining your explicit consent for the transfer.

#### 7. Your Data Protection Rights

Under the GDPR and UAVG, you have the following rights regarding your personal data:

Right to Information (Article 13 & 14 GDPR): You have the right to be informed about the collection and use of your personal data. This Privacy Policy serves to fulfill this right.

Right of Access (Article 15 GDPR): You have the right to request a copy of the personal data we hold about you.

Right to Rectification (Article 16 GDPR): You have the right to request that we correct any inaccurate or incomplete personal data we hold about you.

Right to Erasure (“Right to be Forgotten”) (Article 17 GDPR): You have the right to request the deletion of your personal data under certain circumstances.

Right to Restriction of Processing (Article 18 GDPR): You have the right to request that we restrict the processing of your personal data under certain circumstances.

Right to Data Portability (Article 20 GDPR): You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit that data to another controller.

Right to Object (Article 21 GDPR): You have the right to object to the processing of your personal data under certain circumstances, including for direct marketing purposes.

Rights in relation to Automated Decision-Making and Profiling (Article 22 GDPR): 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, unless certain exceptions apply.

To exercise any of these rights, please contact us using the details provided in Section 10. We will respond to your request within one month.

## 8. Data Security

We implement appropriate technical and organizational measures to protect your personal data from unauthorized access, loss, destruction, alteration, or disclosure. These measures include:

Encryption: Using encryption for data in transit and at rest where appropriate.

Access Controls: Limiting access to personal data to authorized personnel on a need-to-know basis.

Regular Security Audits: Conducting regular assessments of our security practices.

Employee Training: Providing data protection and security training to our employees.

Physical Security: Implementing physical safeguards to protect our systems and data storage.

While we strive to protect your personal data, no security system is impenetrable. We cannot guarantee the absolute security of your information.

## 9. Cookies and Similar Technologies

Our website may use cookies and similar technologies (e.g., web beacons, pixels) to enhance your Browse experience, analyze website traffic, and for marketing purposes. You can manage your cookie preferences through your browser settings. For more detailed information, please refer to our separate Cookie Policy [Link to your Cookie Policy, if you have one].

## 10. Contact Us

If you have any questions about this Privacy Policy, your personal data, or wish to exercise your data protection rights, please contact us:

Greenpill

info@greenpill.tech, Koningin Wilhelminaweg 21, 8443 EJ Heerenveen, The Netherlands.

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## 11. Complaints

If you are not satisfied with our response to your privacy concerns, you have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens - AP):

Autoriteit Persoonsgegevens Postbus 93374 2509 AJ Den Haag The Netherlands Website: [www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl)

## 12. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. We will notify you of any significant changes by posting the updated policy on our website and, where appropriate, by other communication channels. We encourage you to review this Privacy Policy periodically.

This Privacy Policy was last updated on June 26, 2025.