

Privacy Policy

Welcome to Gustave Connect! We are pleased that you are using our Services (“Services”). Data protection and data security when using our Services are very important to us. We would therefore like to inform you which of your personal data we collect and for what purposes it is used.

BACKGROUND

This Privacy Policy describes our privacy practices in plain language, keeping legal and technical jargon to a minimum, to make sure you understand the information provided. However, to achieve this objective we would like to explain to you the following concepts.

a) What is Personal Data?

Personal Data is any includes information relating to an individual who can be identified or who is identifiable, directly from the information in question; or who can be indirectly identified from that information in combination with other information.

b) What is Processing?

"Processing" means and covers virtually any handling of data.

WHAT LAW APPLIES?

We will only use your Personal Data in accordance with the applicable data protection laws, in particular the Dutch GDPR Implementation Act (Uitvoeringswet Algemene Verordening gegevensbescherming) (“UAVG”) and the EU's General Data Protection Regulation (“GDPR”).

WHO IS RESPONSIBLE?

We are Gustave Connect (“Gustave Connect” or “we”, “us”), and our registered address is Schiemond 20, 3024EE, Rotterdam, NL.

We encourage you to read this Privacy Policy carefully, and if you have any questions or concerns about how we use your Personal Data, please contact us using info@gustave.io and we will do our best to address your concerns.

DATA COLLECTION

All Personal Data that we obtain from you will only be processed for the purposes described in more detail below. In particular, we collect Personal Data only if:

- you have given your consent;
- the data is necessary for the fulfillment of a contract / pre-contractual measures;
- the data is necessary for the fulfillment of a legal obligation; or
- the data is necessary to protect the legitimate interests of our company and business.

DATA RETENTION

We process and store your Personal Data only for the period of time required to achieve the respective processing purpose or for as long as a legal retention period exists (in particular commercial and tax law in accordance with applicable Commercial Laws and Fiscal Codes and others for up to 8 years). Once the purpose has been achieved or the retention period has expired, the corresponding data is routinely deleted.

DATA WE COLLECT

a) Contacting Us

We offer you the opportunity to contact us using various methods. We collect the data you submit such as your name, email address, telephone number and your message in order to process your enquiry and respond to you. The legal basis is both your consent and contract.

b) Contracting with us

The protection of your data is particularly important to us in the performance of our contractual services. We therefore only want to process as much Personal Data (for example, your name, address, e-mail address or telephone number) as is absolutely necessary. Nevertheless, we rely on the

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processing of certain Personal Data, to fulfill our contractual obligations to you or to carry out pre-contractual measures.

a) Our Services

As mentioned above, we process the Personal Data involved in your use of our *Services* (“Service Data”) in order to be able to provide our services. We recognize that you own your Service Data and provide you with complete control of your Service Data by providing you the ability to (i) access your Service Data, (ii) share your Service Data through supported third-party integrations, and (iii) request export or deletion of your Service Data.

Where we process Service Data as Data Processor or in other words on behalf of you, we will process the Service Data involved in your use of our services in accordance with your instructions and shall use it only for the purposes agreed between you and us.

We ensure that access by our employees to your data is only available on a need-to-know basis, restricted to specific individuals, and is logged and audited. We communicate our privacy and security guidelines to our employees and enforce privacy and protection safeguards strictly.

For the purpose of providing our Services all Service Data processed by us will be processed using [Hetzner](#) and [OpenAI OpCo, LLC](#). We take appropriate legal precautions and corresponding technical and organizational measures to ensure the protection of your Service Data. For further information, please also refer to our Data Processing Addendum.

b) Your end users

When you design, integrate and configure your Services (see a) and b) above), we may also process Personal Data of your end users. The Personal Data processed by us depends on how you are using our Services and the requests you and/ your end users are submitting. In this sense you have full control over how you and your end user are using our Services, for example by using configuration options and settings, and the Personal Data that is processed by us. The Personal Data your end users provide, will depend on your configuration and may requires integration via an inline frame element (iframe) and the processing of your end users IP addresses and other Personal Data and will be processed for the purpose of responding to your end users request using the Services.

Further and if you are providing us with Personal Data relating to a third party, you agree a) that you have in place all necessary appropriate consents and b) that such third party has read this Privacy Policy. You agree to indemnify us in relation to all and any liabilities, penalties, fines, awards, or costs arising from your non-compliance with these requirements.

The legal basis is the provision of a contractual service. Further and in accordance with the UAVG and the GDPR we act as the Data Processor. Some jurisdictions may require you to disclose your use of our Services and Gustave Connect as your processor in your privacy policy and/or data processing agreement as applicable.

c) Support ticket

If you create a support ticket, we will request Personal Data and, where applicable, non-Personal Data in accordance with your request, this may include your name, email address and other order related data you voluntarily provide. The data provided is not shared with third parties and cannot read your data when it is entered. If you submit a support ticket, we process the data for the purpose of processing and handling your ticket.

Our employees will also have access to data that you knowingly share with us for technical support or to import data into our services. We communicate our privacy and security guidelines to our employees and enforce privacy safeguards strictly. The legal basis of the data processing is our obligation to fulfill the contract and/or our legitimate interest in processing your support ticket.

d) Administration

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We process data in the context of administrative tasks as well as organization of our business, and compliance with legal obligations, such as archiving. In this regard, we process the same data that we process in the course of providing our contractual services. The processing bases are our legal obligations and our legitimate interest.

e) Artificial Intelligence Act Compliance

In accordance with the Artificial Intelligence Act ("EU AI Act") we have taken the following steps: (i) assessed the risks associated with our AI Assistant (Limited risk), (ii) raise awareness (this policy and the use of AI Tools are clearly described on our website), (iii) designed our AI Assistant on ethical principles, (iv) assigned responsibility over Gustave Connect AI Assistant to our CEO, (v) continue to develop Gustave Connect AI Assistant and keep it up-to-date, and (vi) established formal governance.

DATA SHARING

In certain cases, it is necessary to transmit the processed Personal Data in the course of data processing. In this respect, there are different recipient bodies and categories of recipients.

a) Internal

If necessary, we transfer your Personal Data within Gustave Connect. Of course, we comply with the UAVG and the GDPR and ensure that your data is processed properly. Access to your Personal Data is only granted to authorized employees who need access to the data due to their job, e.g., to provide our services or to contact you in case of queries. For further information in relation to the adequate protection for your Personal Data when it is transferred within Gustave Connect, please refer to our Data Processing Addendum.

b) External bodies

Personal Data is transferred to our service providers in the following instances:

- in the context of fulfilling our contract with you,
- to use marketing services and to advertise our services online,
- to communicate with you,
- to provide our Services, and
- to state authorities and institutions as far as this is required or necessary.

c) International transfers

We may transfer your Personal Data to other companies as necessary for the purposes described in this Privacy Policy. In order to provide adequate protection for your Personal Data when it is transferred, we have contractual arrangements regarding such transfers. We take all reasonable technical and organizational measures to protect the Personal Data we transfer.

DATA SECURITY

Our services use SSL or TLS encryption to ensure the security of data processing and to protect the transmission of confidential content that you send to us. We have also implemented numerous security measures ("technical and organizational measures") for example encryption or need to know access, to ensure the most complete protection of Personal Data processed through our Services. For further information, please also refer to our Data Processing Addendum.

Nevertheless, internet-based data transmissions can always have security gaps, so that absolute protection cannot be guaranteed. And databases or data sets that include Personal Data may be breached inadvertently or through wrongful intrusion. Upon becoming aware of a data breach, we will notify all affected individuals whose Personal Data may have been compromised as expeditiously as possible after which the breach was discovered.

YOUR RIGHTS AND PRIVILEGES

Privacy rights

You can exercise the following rights:

- *The right to access;*
- *The right to rectification;*
- *The right to erasure;*

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- *The right to restrict processing;*
- *The right to object to processing; and*
- *The right to data portability;*

Updating your information and withdrawing your consent

If you believe that the information we hold about you is inaccurate or request its rectification or deletion or object to legitimate interest processing, please do so by contacting us.

Access Request

In the event you want to make a Data Subject Access Request, please contact us. We will respond to requests regarding access and correction as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days, we will tell you why and when we will be able to respond to your request. If we are unable to provide you with any Personal Data or to make a correction requested by you, we will tell you why.

Complaint to a supervisory authority

You have the right to complain about our processing of Personal Data to a supervisory authority responsible for data protection. The supervisory authority in the Netherlands is: Autoriteit Persoonsgegevens, Bezuidenhoutseweg 30, 2594 AV DEN HAAG, The Netherlands, (<https://autoriteitpersoonsgegevens.nl/en>). We would, however, appreciate the chance to deal with your concerns before you approach the Autoriteit Persoonsgegevens.

What we do not do

- We do not request Personal Data from minors and children;
- We do not process special category data without obtaining prior specific consent;
- We do not use automated decision-making including profiling; and
- We do not sell your Personal Data.

HELP AND COMPLAINTS

If you have any questions about this policy or about data protection at Gustave Connect in general, please contact us using info@gustave.io and we will do our best to address your concerns.

CHANGES

The first version of this policy was issued on Saturday, 26th of April, 2025, and is the current version. Any prior versions are invalid, and if we make changes to this policy, we will revise the effective date.