

WatchIT

watchitpro.com

PRIVACY POLICY (GDPR COMPLIANT)

WatchIT Pro B.V.

Effective Date: July 13, 2026

WatchIT Pro B.V. — Data Controller

Chamber of Commerce (KVK) number: *to be confirmed upon incorporation of the B.V.*

Registered office address: *to be confirmed*

Privacy contact: privacy@watchitpro.com

Article 1: General Provisions & Data Controller

- Scope:** This Privacy Policy outlines how WatchIT Pro B.V. (hereinafter: "WatchIT Pro", "we", "us") collects, processes, stores, and transfers Personal Data of natural persons acting as Users, corporate representatives, employees, ultimate beneficial owners (UBOs), or contact persons of corporate entities utilizing our B2B watch auction platform.
- Data Controller:** WatchIT Pro B.V., a private limited liability company incorporated under Dutch law, acts as an independent Data Controller as defined under the General Data Protection Regulation (GDPR). Its identity and contact details are set out in the box above; data subjects may exercise their rights or raise questions via privacy@watchitpro.com.
- Third-Party Controllers:** Our Payment Provider, Online Payment Platform (OPP), acts as a separate, independent Data Controller concerning financial data, identity verification documents, and compliance records processed under Anti-Money Laundering (AML) laws.

Article 2: Categories of Personal Data Processed

We process the following categories of Personal Data:

- **Identity and Onboarding Data:** Full name, date of birth, nationality, copies of government-issued identification documents (passports/ID cards), and proof of residential address of directors, corporate representatives, and UBOs.
- **Corporate Contact Information:** Corporate email addresses, business telephone numbers, job titles, and physical corporate addresses.
- **Financial and Transactional Logs:** Corporate bank account numbers (IBAN/BIC), payment tracking numbers, billing addresses, transaction history logs, and platform commission history.
- **Technical and Usage Data:** IP addresses, device identifiers, login credentials, browser types, location data via geofencing, API interaction logs, and platform messaging metadata, including tracking technologies described in Article 2a below.

Article 2a: Cookies and Similar Tracking Technologies

1. The Platform uses strictly necessary cookies and session tokens required for login and core platform functionality; these do not require consent under Dutch and EU e-privacy rules.
2. Where the Platform or its outbound emails use non-essential tracking technologies (such as analytics cookies or email open-tracking pixels used to confirm delivery of dealer communications), these are used only to the extent permitted by applicable law, and separate notice and, where required, consent will be provided at the relevant point of use.

Article 3: Legal Bases and Purposes of Processing

We process Personal Data under the following legal frameworks:

1. **Performance of a Contract (Article 6(1)(b) GDPR):** To establish and manage platform accounts, facilitate auctions, automate data matching for DHL logistics, and process communication between Buyers and Sellers.
2. **Compliance with Legal Obligations (Article 6(1)(c) GDPR):** To adhere to mandatory financial reporting, fiscal compliance, corporate record retention, and Anti-Money Laundering (AML) / Know Your Customer (KYC) identity verification directives.
3. **Legitimate Interests (Article 6(1)(f) GDPR):** To safeguard platform security, prevent shill bidding and off-platform circumvention, deploy anti-scraping defenses, analyze marketplace trends, and facilitate corporate restructuring, mergers, or asset acquisitions as described in Article 4.

Article 4: Data Transfer in Corporate Acquisitions (M&A Clause)

1. **Corporate Asset Transfer:** The User and all associated data subjects are informed and acknowledge that, in the framework of a corporate sale, merger, share transfer, asset buyout, joint venture, or general corporate restructuring of WatchIT Pro B.V., the platform's user database — including historical corporate data, KYC/KYB dossiers, verification logs, transaction histories, platform communications, and associated Personal Data — may be transferred to the acquiring third-party legal entity as part of that transaction, subject to the safeguards described in this Article.
2. **Legitimate Interest Justification:** This data migration, where it occurs, is carried out under Article 6(1)(f) GDPR (Legitimate Interest) to preserve operational business continuity, maintain historical marketplace data, defend past transaction records, and facilitate an orderly transition of platform ownership.
3. **Due Diligence Access:** During a pre-acquisition due diligence phase, redacted corporate user data is made accessible to prospective buyers and their legal/financial advisors under strict Non-Disclosure Agreements (NDAs) wherever this is sufficient for the purpose; full, unredacted data is shared only where redacted data would not suffice, and always under an NDA.
4. **Continuity of Rights:** Following an acquisition, the acquiring entity shall become the new Data Controller and shall remain bound by the data security, processing standards, and usage constraints mandated under the GDPR and this Privacy Policy.

5. **Right to Object:** Because this processing relies on legitimate interest, data subjects retain the right to object to it at any time under Article 21 GDPR, by contacting privacy@watchitpro.com, without prejudice to WatchIT Pro's ability to demonstrate compelling legitimate grounds where applicable.

Article 5: Data Sharing and International Transfers

1. **Logistics and Payment Integration:** Personal Data is shared via secure API endpoints with our logistics partner (DHL) and financial clearer (OPP) exclusively to execute transactions, generate shipping labels, and manage escrow accounts.
2. **Third-Country Transfers:** If data is transferred outside the European Economic Area (EEA) to an international service provider, such transfers are bound by the European Commission's Standard Contractual Clauses (SCCs) alongside comprehensive technical and organizational security measures to guarantee an equivalent level of data protection.

Article 6: Data Retention and Disposal

1. **Standard Retention:** Personal Data processed for account maintenance is retained for the duration of the User's active registration on the Platform.
2. **Statutory Retention:** Following account deactivation, transactional history, financial data, and KYC verification logs are retained for a mandatory period of 7 (seven) years, reflecting both Dutch fiscal record-keeping obligations and the Wwft minimum retention period for customer due diligence data.
3. **Data Sanitization:** Upon expiration of the retention periods, data is permanently deleted, or anonymized using industry-standard techniques to render it impossible to trace back to a natural person.

Article 7: Data Subject Rights

Natural persons whose data we process possess the following rights under the GDPR:

- **Right of Access:** To request a copy of the personal data we hold about them.
- **Right to Data Portability:** Where processing is based on consent or on a contract and carried out by automated means, to receive their data in a structured, commonly used, machine-readable format.
- **Right to Rectification and Erasure:** To correct inaccuracies or request the deletion of data, provided such data is no longer required for legal compliance or contractual execution.
- **Right to Restriction and Objection:** To object to processing based on legitimate interests (including the M&A processing described in Article 4) or request processing limitations during active disputes.
- **Automated Decision-Making:** Certain compliance checks — including the Sanctions and Politically Exposed Persons (PEP) screening described in the AML & KYC Policy — are performed automatically and may result in an automatic refusal of registration or suspension of an account without prior human review. Data subjects have the right to request human review

of such a decision, to express their point of view, and to contest it, by contacting our Compliance Department.

- **Submission of Claims:** Data subjects may exercise their rights by contacting our Compliance Department. They also possess the statutory right to file an official complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

Questions about this Policy or your data? Contact privacy@watchitpro.com.