



Privacy Policy

With this privacy policy we inform you about the scope of the processing of your personal data (hereinafter "data"). In principle, we will only use your personal data in accordance with the applicable data protection laws, in particular Curaçao's National ordinance on data protection ("NODP"), the Dutch GDPR Implementation Act (*Uitvoeringswet Algemene Verordening gegevensbescherming*) ("UAVG") and the EU's General Data Protection Regulation ("GDPR"), and only as described in this privacy policy.

What is Personal data?

Personal data is any information relating to personal or material circumstances that relates to an identified or identifiable individual. This includes, for example, your name, date of birth, e-mail address, postal address, or telephone number as well as online identifiers such as your IP address. In contrast, information of a general nature that cannot be used to determine your identity is not personal data. This includes, for example, the number of users of a website. However, we reserve the right to put this data to additional uses to the extent permitted or required by law or necessary to support legal or criminal investigations. In this case, we will inform you again about this further data processing to the extent required by law and obtain your consent.

Responsible for data processing

Responsible for data processing in accordance with the provisions of the NODP, UAVG and the GDPR is CFS-Global BV, Troepiaalweg 19-A, Julianadorp, Curaçao. You can reach us Monday through Thursday 9:00 a.m. to 5:00 p.m. and Friday from 9:00 a.m. to 4:00 p.m. using + (5999) 529 8259 or info@cfs-global.net.

General information on data processing

In the course of our business operations and in offering our website, we process data. This may require us to disclose data by transmission to third parties and, where applicable, to so-called third countries outside Curaçao and the EEA. Where we transfer data outside Curaçao or EEA, we have highlighted this accordingly below.

Data processing

The individual data concerned, processing purposes, legal bases, recipients and, where applicable, transfers to third countries are listed below:

Hosting

To provide our website, we use a web hosting service, who process the data mentioned below and all other data that is processed in connection with the operation of our website on our behalf. Our website is hosted using the services of [Terdis Webhosting Curaçao](#). The legal basis for the data processing is our legitimate interest in providing our website.

Content Delivery System

We also use the Content Delivery System of WordPress a service provided by [Automattic Inc](#), to publish and maintain the created and edited Content and texts on our website and to provide the forms used. This means that all content and texts submitted to us by users for publication is transferred to WordPress. In addition to texts, this also includes, for example your data in our forms. The legal basis for this processing is our legitimate interest.

Log files

We log your website visit. In doing so, Fasthosts on our behalf process:

- Name(s) of our accessed web site(s),
- date and time of the access,
- the amount of data transferred,



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- the browser type and version,
- the operating system you use,
- the referrer URL (the previously visited web site),
- your IP address,
- the requesting provider.

The legal basis for data processing is our legitimate interest in the ongoing provision and security of our website.

The log file is deleted after seven days, unless it is needed to prove or clarify specific legal violations that have become known within the retention period.

Contacting us

If you contact us, we process the following data from you for the purpose of processing and handling your enquiry: Name, contact details -if provided by you- and your message. The legal basis of the data processing is our obligation to fulfill the contract and/or to fulfill our pre-contractual obligations in and/or our legitimate interest in processing your inquiry.

We also offer to contact us via the messaging services of [WhatsApp](#). If you contact us via WhatsApp we store and use the mobile phone number, you use and - if provided - your first and last name in accordance with the provision of a contractual or pre-contractual measure to process and respond to your request.

If you contact or connect with us via [Facebook](#), we and Facebook are jointly responsible for the processing of your data and enter into a so-called joint controller agreement. The legal basis is our legitimate interest, your consent or, in some cases, the initiation of a contract.

Processing in the context of service provision

We process various data within the framework of the provision of our services and for the initiation and processing of the existing contractual relationship between you and us. If you have commissioned us to provide a service, we process your data (if provided: Name, contact details, address, bank details) and all information that is necessary in the context of fulfilling our accountancy services, and of course exclusively for the purpose of processing and handling the contractual relationship. This includes in particular our consulting, support and other services, correspondence with you, invoicing, fulfillment of our accounting and tax obligations. Accordingly, the data is processed on the basis of our contract as well as to fulfill our legal obligations.

Use of cookies

We use so-called cookies on our website. Cookies are pieces of information that are transmitted from our web server or third-party web servers to your web browser and stored there for later retrieval. Cookies may be small files or other types of information storage. There are different types of cookies: i) Essential Cookies. Essential cookies are cookies to provide a correct and user-friendly website; and ii) Non-essential Cookies. Non-essential Cookies are any cookies that do not fall within the definition of essential cookies, such as cookies used to analyze your behavior on a website (“analytical” cookies) or cookies used to display advertisements to you (“advertising” cookies).

As set out in Curaçao’s National ordinance on data protection (“NODP”), the Dutch Telecommunications Act (*Wet van 4 februari 2015 tot wijziging van de Telecommunicatiewet*) (“TA”) and the EU counterpart the Privacy and Electronic Communications Directive (“PECD”) we need to obtain consent for the use of Non-essential Cookies. For further information on the cookies we use, please refer to our Cookie Policy. The legal basis for processing is our legitimate interest and your consent.



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Direct marketing in the context of a customer relationship

Insofar as you have also given us your separate consent to process your data for consulting, marketing and advertising purposes, CFS-Global is entitled to contact you for these purposes via the communication channels you have given your consent to.

Third Parties

Analytics

On the basis of our legitimate interests (i.e., interest in the analysis, optimization and economic operation of our website we use Google Analytics, a web analytics service provided by [Google LLC](#). Google uses cookies. The information generated by the cookie about the use of the online offer by the users is usually transmitted to a Google server in the USA and stored there. Google will use this information on our behalf for the purpose of evaluating your use of our website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. In doing so, pseudonymous user profiles can be created from the processed data. You can find Google's opt out from Google Analytics tool at <http://tools.google.com/dlpage/gaoptout?hl=en>.

Google Fonts

We use Google Fonts by [Google LLC](#), on our website to display external fonts. To enable the display of certain fonts on our website, a connection to the Google server in the USA is established when our website is accessed. The connection to Google established when you call up our website enables Google to determine which website sent your request and to which IP address the display of the font is to be transmitted. This represents a legitimate interest.

Font Awesome

We integrate Font Awesome of [Fonticons Inc](#), whereby the user's data is used solely for the purpose of displaying the fonts in the user's browser. The integration is based on our legitimate interest.

Duration of data storage

We only store personal data for as long as it is necessary for the purposes for which it is processed or for as long as any consent you have given us has been revoked by you. Insofar as statutory retention obligations must be observed, the storage period for certain data may be up to 6 years, irrespective of the processing purposes.

Transfer of personal data

CFS-Global will not disclose or otherwise distribute your personal data to third parties unless this is necessary for the performance of our services, you have consented to the disclosure or the disclosure of data is permitted by relevant legal provisions.

CFS-Global is entitled to outsource the processing of your personal data in whole or in part to external service providers acting as processors for CFS-Global. External service providers support us, for example, in the technical operation and support of the website, data management, the provision and performance of services, marketing, as well as the implementation and fulfillment of reporting obligations.

The service providers commissioned by CFS-Global process your data exclusively in accordance with our instructions. CFS-Global remains responsible for the protection of your data, which is ensured by strict contractual regulations, technical and organizational measures and additional controls by us.



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Personal data may also be disclosed to third parties if we are legally obliged to do so e.g., by court order or if this is necessary to support criminal or legal investigations or other legal investigations or proceedings at home or abroad or to fulfill CFS-Global ' legitimate interests.

Automated decision-making

Automated decision-making including profiling does not take place on the part of CFS-Global .

Your data subject rights

Information

Upon request, we will provide you at any time and free of charge with information about all personal data that we have stored about you.

Correction, deletion, restriction of processing (blocking), objection

If you no longer agree with the storage of your personal data or if this data has become incorrect, we will arrange for the deletion or blocking of your data or make the necessary corrections (insofar as this is possible according to the applicable law) on the basis of a corresponding instruction. The same applies if we are only to process data in a restrictive manner in the future. You have the right to object in particular in cases where your data is required for the performance of a task that is in the public interest or in our legitimate interest, as well as profiling based on this. You also have such a right of objection in the event of data processing for the purpose of direct advertising.

Right to revoke consent with effect for the future

You may revoke your consent at any time with effect for the future. Your revocation will not affect the lawfulness of the processing up to the time of revocation.

Data portability

If data is processed on the basis of a contract, pre-contractual negotiations, consent or with the help of automated procedures, you have the right to data portability. Upon request, we will provide you with your data in a common, structured and machine-readable format so that you can transfer the data to another data controller if you wish.

Exercise of your data subject rights and right of appeal

To assert these rights, please contact us. The same applies if you have questions about data processing in our company. You also have the right to lodge a complaint with a data protection supervisory authority. We would, however, appreciate the chance to deal with your concerns in the first instance and before you approach a data protection supervisory authority.

Security

State-of-the-art internet technologies are used to ensure the security of your data. During the online enquiry process, your details are secured with SSL encryption. For secure storage of your data, the systems are protected by firewalls that prevent unauthorized access from outside. In addition, technical and organizational security measures are used to protect the personal data you have provided against accidental or intentional manipulation, loss, destruction or access by unauthorized persons.

Updating your information

If you believe that the information we hold about you is inaccurate or that we are no longer entitled to use it and want to request its rectification, deletion, or object to its processing, please do so within your account or contact us. For your protection and the protection of all of our users, we may ask you to provide proof of identity before we can answer the above requests.

Keep in mind, we may reject requests for certain reasons, including if the request is unlawful or if it may infringe on trade secrets or intellectual property or the privacy of another user. Also, we may not



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be able to accommodate certain requests to object to the processing of personal information, notably where such requests would not allow us to provide our service to you anymore.

Links to other providers

Our website also contains - clearly recognizable - links to the websites of other companies. Insofar as there are links to websites of other providers, we have no influence on their contents. Therefore, no guarantee or liability can be assumed for these contents. The respective provider or operator of the pages is always responsible for the content of these pages.

The linked pages were checked for possible legal violations and recognizable infringements at the time of linking. Illegal contents were not recognizable at the time of linking. However, permanent monitoring of the content of the linked pages is not reasonable without concrete indications of a legal violation. Such links will be removed immediately if infringements of the law become known.

Personal information and children

Our services are aimed at people aged 18 and over. We will not knowingly collect, use or disclose personal information from minors under the age of 18 without first obtaining consent from a legal guardian through direct offline contact.

Changes and updates to the privacy policy

We kindly ask you to regularly inform yourself about the content of our privacy policy. We will amend the privacy policy as soon as changes to the information processing activities we carry out make this necessary. We will inform you as soon as the changes require an act of cooperation on your part (e.g., consent) or other individual notification.

Concerns and Contact

If you have any concerns about a possible compromise of your privacy or misuse of your personal information on our part, or any other questions or comments, you can contact us using + (5999) 529 8259 or info@cfs-global.net. We will be happy to help you.

Effective Date

This Privacy Policy was last updated on Saturday, 30th of September 2023.