

## Veros Privacy Overview

### 1. Our Role Under GDPR

Veros Solutions B.V. is a Netherlands-based software company providing global trade management tools.

For the Veros Platform:

- Veros primarily acts as a **Data Processor**
- Customers act as **Data Controllers**

For limited technical and security-related processing (e.g., security logs), Veros may act as an independent Controller.

For sales and marketing activities, Veros acts as Controller.

### 2. Categories of Personal Data Processed

The Veros platform is designed primarily to process business and trade compliance data.

Limited personal data may be processed in connection with platform usage, including:

- User name
- Business email address
- Optional avatar image
- Internal system identifiers
- IP address (for security logging)

Customers may upload business documents that incidentally contain personal data, such as business contact details. Veros processes such data strictly as a processor and only to provide the service.

Veros does not require or intentionally process special categories of personal data.

### 3. Purpose of Processing

As a Processor, Veros processes personal data solely to:

- Create and manage user accounts
- Authenticate users
- Enable collaboration within the platform
- Provide technical support
- Ensure platform security and reliability

Veros does not use customer personal data for marketing, profiling, or independent analytics within the platform.

## 4. Data Storage & Residency

Customer data is stored and processed within the European Union.

Primary hosting region:

AWS EU-West-3 (Paris, France)

Optional enterprise configurations or specific feature enablement may involve international data transfers. Where this occurs, appropriate safeguards are implemented, including:

- European Commission adequacy decisions; or
- Standard Contractual Clauses (SCCs)

## 5. Subprocessors

Veros engages a limited number of trusted subprocessors for:

- Cloud infrastructure hosting
- AI-assisted functionality
- Error monitoring and diagnostics

All subprocessors are engaged under GDPR-compliant data processing agreements.

An up-to-date subprocessor list is available upon request.

## 6. Data Retention & Deletion

Default retention within customer environments is 7 years, unless otherwise configured by the customer.

Upon contract termination:

- Customer environments are deleted within 30 days unless otherwise agreed.

Backups may contain personal data and are retained according to predefined technical retention schedules. Backups are encrypted and used solely for disaster recovery.

## 7. International Transfers

Where personal data is transferred outside the EU/EEA:

- Standard Contractual Clauses are implemented where required.
- Additional technical safeguards, including encryption, are applied.

Transfers are limited to what is necessary to provide the requested functionality.

## 8. Data Subject Rights

Data subjects using the Veros Platform should contact the organization that granted them access.

Where Veros receives a request directly, it coordinates with the relevant customer as Controller.

## 9. Breach Notification

If Veros acts as Processor and becomes aware of a personal data breach affecting customer data:

- The customer (Controller) is notified without undue delay and no later than 24 hours after confirmed discovery.
- Veros provides support for regulatory reporting where required.

## 10. Data Protection Contact

For privacy-related questions: [privacy@veros.ai](mailto:privacy@veros.ai)