

# Privacy Policy of SNC HOLDING BV

Last updated: 5 September 2025

## 1. Introduction

Welcome to SNC HOLDING BV. Your privacy is important to us. This Privacy Policy explains how we collect, use, disclose, and protect personal data when you use our website ([www.snc.xyz](http://www.snc.xyz)) and related services (the “Services”). We adhere to the European General Data Protection Regulation (GDPR) and the Dutch Implementation Act (UAVG). By using our Services, you accept the practices described in this policy.

## 2. Controller / Contact Information

- Controller: SNC HOLDING BV (Chamber of commerce 86170015)
- Contact email: [hello@snc.xyz](mailto:hello@snc.xyz)
- Supervisory Authority: Autoriteit Persoonsgegevens (Dutch Data Protection Authority), The Hague, Netherlands

## 3. What personal data we collect

Depending on how you use our Services, we may collect the following categories of personal data:

- Identity / user account data (e.g. name, username, profile picture)
- Contact information (e.g. email address, phone number)
- Technical / usage data (e.g. IP address, browser type, pages visited)
- Cookies & tracking data
- Communications data (e.g. messages, feedback)
- Transaction / billing data (e.g. invoices, payment details)

## 4. Legal bases for processing

We rely on one or more of the following legal bases under GDPR Article 6:

1. Consent
2. Performance of a contract
3. Legal obligation
4. Legitimate interests

## 5. Purposes of processing & use

We process your personal data for purposes such as:

- Providing and improving our Services
- Managing your account
- Sending transactional or marketing communications
- Analytics and reporting
- Security, fraud prevention, and compliance

## **6. Cookies, tracking & third-party analytics**

We use cookies and similar tracking technologies. Where required, we obtain your consent via a cookie banner. You can change or withdraw consent at any time.

## **7. Sharing, disclosure & third parties**

We may share data with:

- Service providers / processors
- Affiliates / subsidiaries
- Legal/regulatory authorities
- In case of mergers or acquisitions

## **8. Data retention**

We retain personal data only as long as necessary for the purposes described above, and in line with legal obligations. Data is securely deleted or anonymized afterwards.

## **9. Security & data protection**

We implement appropriate technical and organizational measures, including encryption, access controls, audits, and incident response protocols.

## **10. Data breaches & notification**

In case of a data breach, we will notify the Dutch Data Protection Authority within 72 hours if required, and inform affected individuals if risks are high.

## **11. Your rights**

Under GDPR, you have rights of access, rectification, erasure, restriction, portability, objection, and withdrawal of consent. You may also lodge a complaint with the Autoriteit Persoonsgegevens.

## **12. Automated decision-making / profiling**

If we engage in automated decision-making with significant effects, we will inform you and provide options to exercise your rights.

## **13. Minors**

We do not knowingly collect personal data from children under 16 without parental consent. If collected in error, data will be deleted.

## **14. Changes to this Privacy Policy**

We may update this Privacy Policy from time to time. Changes will be posted with a new 'Last updated' date. Significant changes may require renewed consent.

## **15. Miscellaneous**

This Policy is governed by Dutch law. In case of conflict, the legally binding version prevails.