

PRIVACY POLICY

1. Who are we?

Caroz B.V. ("Caroz", "we", "our", "us") is a Fourth-Party Logistics (4PL) service provider and supply chain control tower organization, registered in the Netherlands under Chamber of Commerce number 17121030.

Caroz provides logistics management, transportation coordination, supply chain visibility, carrier management and related digital platform services.

For questions regarding this Privacy Policy or the processing of personal data, please contact us at:

Email: privacy@caroz.com

Telephone: +31 77 323 2660

2. Personal data we collect

Depending on the services provided, we may collect and process personal data relating to:

Customer and supplier contacts

- Name
- Job title
- Company name
- Business address
- Business email address
- Business telephone number

Logistics and transportation operations

- Pickup and delivery contact details
- Shipment and transport references
- Delivery addresses
- Electronic signatures upon receipt
- Driver identification details where required
- Vehicle information where required for operational purposes
- Transport status and tracking information

Digital platforms and systems

When using our websites, portals or control tower applications, we may collect:

- Username and login information
- IP address
- Browser type
- Device information
- System usage information
- Audit logs and security logs

Most personal data is obtained directly from customers, suppliers, carriers, logistics partners, or users of our services. We may also receive personal data through system integrations, transportation management systems (TMS), warehouse management systems (WMS), enterprise resource planning systems (ERP), carriers, and other logistics partners.

3. How do we use your information?

We process personal data only where we have a lawful basis under applicable data protection legislation.

Contractual necessity

We process personal data to:

- Deliver logistics and supply chain management services
- Coordinate transportation activities
- Manage shipments and deliveries
- Operate our control tower platform
- Manage customer and supplier relationships
- Provide customer support
- Perform carrier and vendor management
- Manage contracts and service agreements

Legal obligations

We process personal data to:

- Comply with legal and regulatory requirements
- Maintain financial and tax records
- Respond to lawful requests from authorities
- Establish, exercise or defend legal claims
- Comply with transport, customs and trade regulations where applicable

Legitimate interests

We may process personal data to:

- Improve and optimize logistics operations
- Analyze supply chain performance
- Generate operational and management reports
- Ensure network and information security
- Detect and prevent fraud, misuse or unauthorized access
- Conduct business planning, governance and auditing activities
- Maintain and improve our services and systems

Consent

Where required by law, we process personal data based on consent, including:

- Marketing communications
- Optional cookies and tracking technologies
- Other processing activities where consent is legally required

You may withdraw your consent at any time.

4. Controller and Processor roles

Depending on the services provided, Caroz may act either as:

Data Controller

Caroz acts as Data Controller when determining the purposes and means of processing personal data, such as for:

- Supplier management
- Customer relationship management

- Marketing activities
- Website administration
- Human resources activities

Data Processor

Caroz may also act as a Data Processor on behalf of customers when processing personal data as part of logistics, transportation, warehousing and supply chain management services.

In such cases, Caroz processes personal data solely in accordance with the instructions of the relevant customer and applicable data processing agreements.

5. How long do we keep your information?

We retain personal data only for as long as necessary for the purposes for which it was collected and in accordance with applicable laws.

Indicative retention periods include:

Data Category	Retention Period
Customer contracts	7 years after termination
Financial records and invoices	7 years
Transport documentation	7 years
Supplier records	Duration of relationship + 2 years
User account information	Duration of account + 1 year
System and security logs	12 months unless required longer for security investigations
Marketing data	Until consent is withdrawn or objection is received

Longer retention periods may apply where required by law or necessary for legal claims.

6. Your rights

Under the General Data Protection Regulation (GDPR), you have the right to:

- Access your personal data

- Correct inaccurate personal data
- Request deletion of personal data
- Restrict processing
- Object to processing
- Data portability
- Withdraw consent at any time
- Lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens)

For more information visit:

<https://autoriteitpersoonsgegevens.nl>

7. Automated decision-making

Caroz does not use automated decision-making that produces legal or similarly significant effects on individuals without appropriate safeguards.

Where analytics or profiling tools are used for operational reporting, service optimization or system security purposes, such processing will not result in automated decisions that significantly affect individuals.

8. Sharing your information

We do not sell personal data.

We may share personal data with:

- Customers
- Carriers and transportation providers
- Warehousing partners
- Customs and regulatory authorities where required
- IT service providers
- Cloud hosting providers
- Software vendors supporting our logistics and control tower platforms
- Professional advisers, auditors and legal counsel

- Potential purchasers in the event of a merger, acquisition or business transfer

All third parties are required to protect personal data appropriately.

9. Subprocessors and service providers

To deliver our services, Caroz may engage carefully selected service providers and subprocessors, including providers of:

- Cloud infrastructure
- Transportation Management Systems (TMS)
- Warehouse Management Systems (WMS)
- Enterprise Resource Planning (ERP) systems
- Business intelligence and reporting tools
- Communication and collaboration platforms
- Cybersecurity services

Where required by law, appropriate contractual safeguards are implemented.

10. International data transfers

Personal data may be transferred outside the European Economic Area (EEA).

Where such transfers occur, Caroz ensures appropriate safeguards are implemented, including:

- Adequacy decisions approved by the European Commission
 - Standard Contractual Clauses (SCCs)
 - Additional technical and organizational security measures where required
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11. Security of personal data

Caroz takes appropriate technical and organizational measures to protect personal data against unauthorized access, loss, misuse, alteration or disclosure.

These measures may include:

- Access control mechanisms
- Multi-factor authentication

- Encryption of data in transit and at rest where appropriate
 - Security monitoring and logging
 - Vulnerability management
 - Backup and disaster recovery procedures
 - Supplier security assessments
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12. Marketing preferences

You may opt out of marketing communications at any time by:

- Using the unsubscribe link included in emails
- Contacting us directly

Operational and service-related communications may still be sent where necessary for the delivery of services.

13. Cookies

Our websites use cookies and similar technologies.

Cookies may be used for:

- Website functionality
- Security
- Analytics
- User preferences

Where required by law, we will request consent before placing non-essential cookies on your device.

For more information, please consult our Cookie Policy.

14. Contacting us

If you would like to access, update, correct or delete your personal data, or if you have questions regarding this Privacy Policy, please contact:

Privacy Officer

Caroz B.V.

Email: privacy@caroz.com
Telephone: +31 77 323 2660

15. Changes to this Privacy Policy

We may update this Privacy Policy from time to time.

The most recent version will always be available on our website. Material changes may be communicated through appropriate channels, including email where applicable.