

Privacy Statement - Lox Solution B.V.

version 2 - November 2025

As of 29 October 2025, Lox Solution B.V. has legally merged into Sendcloud B.V. All rights and obligations of Lox Solution B.V. have therefore transferred to Sendcloud B.V. by operation of law. Your existing agreements and our services continue without change, but Sendcloud B.V. is now your contracting party.

INTRODUCTION

Lox Solution B.V. (hereinafter referred to as: “**Lox Solution**”, “**we**”, “**us**” and “**our**”) respects your privacy and is committed to protecting your personal data. This privacy statement (hereinafter referred to as: “**Privacy Statement**”) explains which personal data are collected and processed, for what purposes this occurs, how long we retain these personal data, what your rights are and how you can reach us. Below you will find an overview of all paragraphs of this Privacy Statement.

1. Processing of personal data: categories, purposes and legal bases
2. Retention periods
3. Transfer of personal data to third parties
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1. PROCESSING OF PERSONAL DATA: CATEGORIES, PURPOSES AND LEGAL BASES

Personal data are data that can be used to (directly or indirectly) identify a person. Lox Solution collects personal data in various ways, for example when you use our services and products, apply for a job, ask questions (via our website) and/or use the Lox platform. The situation in which Lox Solution collects various types of personal data, for which purposes and on the ground of which legal basis, is described below.

1.1 Clients and customers of our clients

Lox Solution collects and processes the following categories of personal data:

- Contact details: name, (business) email address and (business) telephone number.
- Company details: position, name of employer/company and the location of the company.
- Account details: username and password.
- Invoice details: name, address, and telephone number of customers of our clients.
- Payment details: bank account number.

Lox Solution processes these categories of personal data on the legal basis ‘the performance of a contract’. We process the personal data for the following purposes:

- to make offers to clients regarding the services and products we provide;
- to enter into or execute an agreement, for example, to provide our services and products;
- to provide access to the Lox platform;
- to invoice purchased paid services or products; and
- to maintain a business relationship with our clients.

1.2 Job applicants

If you apply for a job at Lox Solution, we process the following categories of personal data:

- Contact details: name, e-mail address and telephone number.

- Application data: gender, date of birth, photograph (if provided), CV and cover letter.

We process the personal data on the legal basis 'the performance of a contract' to which a job applicant becomes a party. We process the personal data to assess your suitability for a job and to handle the application process.

1.3 Website users/visitors

If you contact Lox Solution and/or visit our website, we process the following categories of personal data:

- Contact details: your name, (business) email address and (business) telephone number.
- Company details: position, name of employer/company and the location of the company.
- Correspondence: email messages, telephone notes and other communications.
- Technical data of the equipment used to visit the website, such as IP address, MAC address and software used.
- Cookies: technical and functional cookies. For more information about cookies and our cookie statement, please refer to paragraph 7 of this Privacy Statement.

We process the personal data on the following legal basis: the processing is necessary for the legitimate interests pursued by Lox Solution. We process the personal data for the following purposes:

- to reply to your question and to handle your requests;
- to communicate with you; and
- to enable the proper functioning of our website.

1.4 Suppliers

When you provide products or services to Lox Solution, we process the following categories of personal data:

- Contact details: your name, (business) email address and (business) telephone number.
- Company details: position, name of employer/company and the location of the company.
- Payment data: bank account number.

We process the personal data on the legal basis 'the performance of an agreement'. We process the personal data for the following purposes:

- to purchase products or services; and
- to maintain business relationships with our suppliers.

2. RETENTION PERIODS

Lox Solution will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

3. TRANSFER OF PERSONAL DATA TO THIRD PARTIES AND SUB-PROCESSORS

Lox Solution may share your personal data with the parties set out below:

Data & Sub processors Names	Headquarters address	Processing location (countries)	In the case of transfers outside the EU/EEA, transfer management rules	Type
Google Cloud	Mountain View, California, USA	Germany	https://policies.google.com/privacy/frameworks?hl=en	Sub processor
Gmail	Mountain View, California, USA	Germany	https://policies.google.com/privacy/frameworks?hl=en	Data & Sub-processor
Hubspot	Cambridge, USA	Switzerland	https://www.hubspot.com/data-privacy/privacy-shield?hubs_content=www.hubspot.fr%2Fdata-privacy%2Fprivacy-shield&hubs_content-cta=hsg-nav_dropdown-country-link	Data Processor
AWS	Seattle, Washington, United States	Paris, France	https://aws.amazon.com/compliance/eu-data-protection/	Sub processor
ActiveCampaign LLC	Chicago, United States		https://www.activecampaign.com/legal/dpa	Sub processor
Praiz	Paris, France			Data Processor
Homerun	Amsterdam, Netherlands		https://www.homerun.co/terms-of-service#dpa	Data Processor
Loom, Inc.	San Francisco, United States		https://www.loom.com/dpa	Data Processor
PandaDoc Inc.	San Francisco, United States		https://www.pandadoc.com/eu-privacy-rights-addendum/	Data Processor
Personio SE & Co. KG	Berlin, Germany		https://www.personio.com/privacy-policy/	Data Processor

Lox Solution has taken extensive technical and organizational measures to protect your personal data and only discloses these personal data to third parties with similar standards of technical and organizational measures. Please contact us using the contact details mentioned in paragraph 9 of this Privacy Statement if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

4. SECURITY

Lox Solution has taken appropriate technical and organizational measures to protect your personal data against loss or any other unauthorized use. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

5. THIRD PARTY LINKS

Our website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

6. YOUR RIGHTS

You have a number of rights with regard to your personal data and the processing thereof:

- the right to a confirmation from Lox Solution that your personal data are being processed or not, and in the event that they are processed, the right to access your personal data and additional information about the processing of your personal data;
- the right to rectification of your personal data, for example if your personal data are not accurate;
- in certain cases the right to request Lox Solution to delete your personal data, for example when your personal data is no longer necessary for the purposes for which the personal data are collected and processed, if you withdraw your consent (when consent is the legal basis for processing) or if the personal data are unlawfully processed;
- in certain cases, the right to obtain from Lox Solution a restriction on the processing of your personal data, for example because you contest the accuracy of your personal data;
- the right to receive, at your request, the personal data that you have made available to Lox Solution in a structured and commonly used electronic format and the right to transfer these personal data to another controller, where the processing is based on your consent or on an agreement;
- the right to object to the processing of your personal data on the basis of legitimate interests of Lox Solution. When you object, Lox Solution no longer processes your personal data unless Lox Solution demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or when it is necessary for the establishment, exercise or defence of a right in legal proceedings;
- when personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for marketing purposes. In that case, Lox Solution no longer processes your personal data for such purposes;
- the right not to have a decision based solely on automatic processing (including profiling), which has legal consequences or affects you in a far-reaching way; and

- the right to withdraw your consent at any time (if consent is the basis for the processing). Withdrawal of consent has no retroactive effect. This means that consent no longer applies from the time of withdrawal.

These rights are not absolute. There may be circumstances in which Lox Solution cannot (fully) implement your request as a data subject. As regards requests for the deletion of personal data, it should be taken into account that Lox Solution will not grant such a request if it is incompatible with the mandatory statutory retention periods of Lox Solution.

If you wish to exercise any of the above rights, please contact us using the contact details mentioned in paragraph 9. Please also contact us using the contact details mentioned in paragraph 9 of this Privacy Statement if you prefer receiving the balance of interests made regarding the legal basis legitimate interests in paragraph 1. The information provided is in principle free of charge. You may exercise these rights at reasonable intervals.

We will respond to your request within one month, unless this is not possible due to the complexity of your request or the number of requests submitted. In such a case, we will inform you no later than within one month and extend our period to respond by a maximum of two months. If a request is granted by Lox Solution, Lox Solution implements the decision to correct, change, delete and/or transfer the personal data as soon as possible.

In addition to the aforementioned rights, if you are dissatisfied with the way in which we process your personal data, handle your request or any other complaint, you have the right to lodge a complaint with the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*), post office box number 93374, 2509 AJ The Hague, the Netherlands. For more information, please visit the website of the Dutch Data Protection Authority at <https://autoriteitpersoonsgegevens.nl>.

7. COOKIE STATEMENT

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

8. CHANGES TO THE PRIVACY STATEMENT

We update this Privacy Statement from time to time. We therefore recommend that you consult it regularly so that you are aware of any changes. We will notify you of significant changes to this Privacy Statement, such as changes in the purposes of processing and changes in the way you can exercise your data subject rights. This Privacy Statement was last amended in October 2023.

9. QUESTIONS AND CONTACT DETAILS

If you have any questions about this Privacy Statement, please contact us at email: dpo@loxsolution.com.