



Whispp *Privacy Policy*

How Whispp B.V. collects, uses, shares and protects your personal data, and the rights you have over it.

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— Contents

In this document

01	Who We Are	03
02	The Data We Collect	04
03	How We Collect Data	05
04	Why We Use Data (Purposes) And Lawful Bases	06
05	Cookies	07
06	Sharing Your Data	09
07	International Transfers	10
08	Data Security	11
09	Data Retention	12
10	Your Rights	13
11	Direct Marketing	14
12	Third-Party Links	15
13	Changes To This Policy	16
14	Contact	17

— Section 01

Who We Are

We are Whispp B.V., a company registered in the Netherlands, with its registered office at Langegracht 70, 2312 NV Leiden, the Netherlands. If you have any questions about this policy, please contact us at privacy@whispp.com.

— Section 02

The Data We Collect

We may collect and process the following categories of personal data:

- **Identity Data** — name and title.
- **Contact Data** — email address, phone number and address.
- **Account Data** — username, preferences and communication history.
- **Technical Data** — IP address, device identifiers, browser type, time zone and cookie IDs.
- **Usage Data** — pages viewed, links clicked and session duration.
- **Marketing & Communications Data** — your preferences in receiving marketing from us.

— Section 03

How We Collect Data

We collect data when you:

- Fill in forms, subscribe to our newsletter, create an account, contact support or interact with us.
- Use our website, which collects data automatically using cookies and similar technologies.
- Receive data from service providers that help us operate our business.

— Section 04

Why We Use Data (Purposes) And Lawful Bases

We use personal data for the following purposes:

Purpose	Description	Lawful basis
Account Management & Delivery	To provide our products, services, and manage your account.	Contract
Customer Support	To respond to your enquiries and provide support.	Legitimate Interests
Marketing to Subscribers	To send newsletters and marketing to individuals who have signed up.	Consent
Marketing to Existing Customers	To promote similar products and services to our current customers, with a clear opt-out provided at any time.	Legitimate Interests
Website Optimization	To improve our website and analyze usage, using non-essential cookies only where you have agreed.	Legitimate Interests / Consent
Fraud Prevention	To detect, investigate, and prevent fraudulent activity on our site.	Legitimate Interests
Regulatory Compliance	To maintain financial records and comply with statutory legal requirements.	Legal Obligation

Table 1. The lawful basis shown applies to that purpose under data protection law.

Our Legitimate Interests

Where we rely on legitimate interests, they include running and security-hardening our platform, delivering efficient customer service, and marketing our business appropriately. You have the right to object to processing based on legitimate interests at any time.

— Section 05

Cookies

We use cookies and similar tracking technologies for functionality, analytics and marketing, and to track activity on our site. Cookies are small data files placed on your device. Where required, we will obtain your consent for non-essential cookies, and you can manage your preferences or withdraw consent at any time via our Cookie Settings banner.

Categories of cookies we use

Category	Description	Lawful basis
Strictly Necessary Cookies	Essential for the website to function. They enable core features like security, network management, and account log-ins. These cannot be switched off.	Legitimate Interests
Performance and Analytics Cookies	Help us understand how visitors interact with our website by collecting and reporting information anonymously (e.g., Google Analytics).	Consent
Functional Cookies	Allow our website to remember choices you make (such as language preferences) to provide an enhanced, personalized experience.	Consent
Targeting and Advertising Cookies	Set through our site by advertising partners to build a profile of your interests and show you relevant ads on other platforms.	Consent

How to control and opt out

- **Our Banner** — Click the “Cookie Settings” link in our website footer to update your choices instantly.

- **Browser Settings** — You can configure your internet browser to refuse all or some cookies, or to alert you when websites set or access cookies.
- **Consequences** — Disabling strictly necessary cookies will impact your ability to use certain parts of our site properly.

— Section 06

Sharing Your Data

We may share personal data with:

- Service providers acting on our behalf (e.g. hosting, IT support, CRM, email).
- Professional advisers (lawyers, accountants), regulators, or law enforcement where legally required.

We require all service providers to safeguard personal data and only process it according to our instructions.

— Section 07

International Transfers

Some providers are located outside the Netherlands. Where we transfer data internationally, we use appropriate safeguards such as Data Transfer Agreements, EU Standard Contractual Clauses, or rely on adequacy decisions.

— Section 08

Data Security

We use technical and organizational measures appropriate to the risk, including access controls, encryption in transit, regular monitoring, staff training and due diligence.

— Section 09

Data Retention

We keep personal data only for as long as necessary for the purposes described above, including to satisfy legal, accounting or reporting requirements. We then securely delete or anonymize it.

— Section 10

Your Rights

You have rights to access, rectify, erase, restrict, object to processing, and data portability, and the right to withdraw consent where processing is based on consent. To exercise these rights, contact us at privacy@whispp.com.

Note

You also have the right to complain to the Autoriteit Persoonsgegevens (AP), the Dutch Data Protection Authority, at any time.

— Section 11

Direct Marketing

We may send you marketing messages if you have opted in. You can opt out at any time using the unsubscribe link in our emails or by contacting us at privacy@whispp.com.

— Section 12

Third-Party Links

Our website may include links to third-party sites or services. We are not responsible for their privacy practices.

— Section 13

Changes To This Policy

We may update this policy from time to time. The latest version will always be available on our website with the date of the most recent update.

— Contact

Get in *touch*

Questions about this policy or your personal data? Contact us using the details below. You also have the right to complain to the Autoriteit Persoonsgegevens (the Dutch Data Protection Authority) at any time.

Email	privacy@whispp.com
Web	whispp.com

This document and its contents are the property of Whispp B.V. The latest version of this Privacy Policy is always available at whispp.com.