

## Global-e Privacy and Cookies Policy

This **Privacy and Cookies Policy** ("Policy") governs how we, Global-e NL B.V. (together with our respective affiliates and subsidiaries, "Global-e", "we", "our" or "us"), acting as data controller, collect, receive, use, store and disclose Information (defined below) about individuals in connection with the use of our online order processing and fulfilment services for the sale of products to you ("Service").

We make great efforts ascertaining that we secure your Information and use it properly.

This policy explains our privacy practices for processing Information regarding our Services. We will collect, use or disclose your Information only in accordance with the terms of this policy.

For Canadian residents: Please note that the personal information we collect from you may be transferred to Europe as well as the United States. By agreeing to this Privacy Policy you consent to your personal information being transferred to the United States and collected, used, and disclosed in accordance with this Policy.

The below summary of this Policy will give you an overview of our practices. Please also take the time to read our full Policy for further detail in each area.

***If you do not wish us to collect your information, please do not submit it to us. However, please bear in mind that we will not be able to process your order without receiving your details.***

Global-e may change and update the terms of this Policy from time to time. If we decide to change our Privacy Policy materially, we will post the revised Policy here with an updated effective date and we will inform you of such changes by any appropriate means.

### Summary of Global-e Privacy and Cookies Policy

#### **The Information You Provide Us and We Collect**

If you use the Service, we will need your Information (such as your name, email address and physical address) to process the transaction and deliver the purchased products. We will need your payment details to process your payment. We will also receive any Information that you provide us when you contact our customer support.

We automatically log 'traffic/session' information including IP addresses and your user agent. We also collect session durations and additional activity information.

**Cookies** - We use cookies to make it easier for you to log-in and to facilitate Service activities. We use standard analytics tools. The privacy practices of these tools are subject to their own privacy policies and cookies.

**What Do We Do with Your Information?** – We use your Information or performing the contract with you and for our related legitimate interests. We maintain the Service, make it better, and continue developing it, and protect us and the Service from misuse and law violations.

**Sharing Information with Others** – We will share Information that we collect with the specific Retailer who owns or operates the website from which you made your purchase. We will provide the Retailer with your Information for Retailer's marketing purposes, if you provided your specific consent.

If you do not agree with the disclosure of your personal information to a third-party retailer, you will not be able to use the Service. By agreeing to this Policy, you agree to the disclosure of your personal information to third-party retailers. You will also need to read and understand the privacy policies of those retailers.

We will share your Information with service providers and other third parties, if necessary, to fulfil the purposes for collecting the information, provided that any such third party will commit to protect your privacy as required under applicable law and this policy.

**EU-US Privacy Shield** – We are self-certified to the EU-US Privacy Shield Framework, in connection with processing Information from EU member states.

**Information in case of a Structural Change** - a merger, acquisition or any other structural change will require us to transfer your Information to other entities, provided that the receiving entities will comply with similarly protective policy in accordance with applicable law.

**Anonymous, Aggregated and Analytical Information** – We may take steps to de-identify and make anonymous some of your personal information so that it no longer can be used to directly or indirectly identify you (we will do this in a way that will also prevent this data from ever being re-identified). We may use Anonymous Data in a number of ways to improve our Services or share it with third parties. In those case, we will do so without notice to you.

**Your Choice** – You may terminate your use of the Service. Our Service responds to Do Not Track (DNT) signals.

**Other Sites and Services** - The Service contains links to third party websites and services that are subject to their own privacy policies. Please read these policies and make sure you understand them.

**Children's Privacy** - We do not intend to collect Information from anyone we know to be under 16 years (for Canadian residents – 18). If you believe that we have collected such information, please contact us.

**Security and Data Retention** – We implement systems, applications and procedures to secure your Information, to minimize the risks of theft, damage, loss of information, or unauthorised access or use of information. We retain data as needed, to provide the Service and for legitimate and lawful purposes.

**Accessing and Correcting Your Information** - At any time you can request access to your Information by contacting us. You may also request that your information be corrected should it be inaccurate.

**Your EU Data Subject Rights** – If we process your Information when you are in the EU, further terms apply to our processing in relation to your rights as a data subject under EU data protection laws.

**Dispute Resolution** – Contact us at: [dataprotection@global-e.com](mailto:dataprotection@global-e.com) or write us for specific requests or complaints. We will make good-faith efforts to resolve any existing or potential dispute with you.

**Changes to this Privacy and Cookies Policy** – We will update this Policy from time to time and post any material changes we make. If you continue to use the Service after these changes are posted, you agree to the revised Policy

**Incorporation to the Terms of Use** - This Policy forms part of the terms and conditions of our Service.

**Contact Us** - please contact us at: [dataprotection@global-e.com](mailto:dataprotection@global-e.com) for further information.

## **Privacy and Cookies Policy**

### **1. How We Collect Your Information**

We receive and collect Information from you in the following ways:

- 1.1. **Purchases**. The Service enables you to purchase online merchandise from retailers in certain countries that do not normally provide order processing and fulfilment services ("Retailers").

If you choose to make a purchase, payment or place an order via the Service we will require sufficient information, including Information, from or about you in order to process and complete the transaction, as well as to provide subsequent notification and support services.

This information will be provided by you to us directly or in certain cases (where you are pre-registered with the Retailer) specific information will be provided by the Retailer to pre-populate transaction forms for ease of completion by you.

- 1.2. **Transaction**. We collect information about the item(s) purchased and about you - the purchaser, in particular: first name, last name, email, phone number and postal address and payment information including the payment method and payment details (with expiration dates) and any payment voucher details that you provide us.
- 1.3. **Delivery**. We collect information about the preferred shipping and delivery details relevant to the specific transaction and contact details to send notification of the placement shipping and fulfilment of the order.
- 1.4. **Enquiries**. When you contact us, or when we contact you, we will receive and process any Information that you provide us.
- 1.5. **Log Files**. We use log files that we collect automatically from your computer or device when you interact with the Service. The information contained in log files includes internet protocol (IP) (the unique address that identifies

your computer or device on the internet), type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser sends to us.

Such information will be used for legitimate interests such as analysing trends, administering the Service, authentication for security purposes of a user's movement around the Service, and gather broad demographic information relating to how purchasers interact with the Service.

"**Information**" means any information relating to an identified or identifiable individual including a first and last name an email address, a home or other physical address, or other contact information. It also includes indirect identifiers such as credit card information or online identifiers.

## 2. Cookies

- 2.1. We use cookies and other similar tracking technologies such as device id's or web beacons to establish a record of your use of the Service. A cookie is an identifier (a small file of letters and numbers) that is sent to your computer or device and enables it to be recognised across a browsing session on the Service or when next visiting the Service.
- 2.2. You can modify the way that we use cookies through configuring your browser or settings on your device. However, the functionality of our Service will be limited if you configure your browser or device to reject cookies.
- 2.3. Cookies are widely used to make websites work, or work more efficiently, as well as to provide information to the site owner or others. Session cookies are temporary cookies that remain in the cookie file of your browser only until your browser is closed. They allow websites to link your actions during a browser session.

Persistent cookies stay in the cookie file of your browser for longer (though how long will depend on the lifetime of the specific cookie or whether you choose to manually delete such cookies).

- 2.4. For further information on cookies, including how to use your browser to block them and how to delete cookies already stored on your device, visit: [www.allaboutcookies.org](http://www.allaboutcookies.org).
- 2.5. Cookies are used by us on the website where we provide the Service to you for the following purposes:

- 2.5.1. **Authentication cookies:** We use session cookies and persistent cookies (up to three days) to enable our Service to keep track of your movement from page to page and store your selections so you do not get asked repeatedly for the same information.

These cookies allow you to proceed through many pages of the Service quickly and easily without having to authenticate or reprocess each new area you visit. For example, these cookies remember your shipping country and selected currency. They also remember you if you return to the Service.

- 2.5.2. **UUID cookies:** This is a persistent cookie which remains on your browser longer and which collects information about a customer's behaviour on a Global-e enabled website (which usually resides on the Retailers website domain), in particular regarding a customer's preferred language, country and currency.

This information is made available to Retailers, who can disable the cookie if they wish so that it is not placed on your device. The information is used to provide the Retailer with relevant information regarding your preferences, should the Retailer wish to customize or adapt certain parts of the website.

- 2.5.3. **Google Analytics ("GA") cookies:** Google sets persistent cookies (up to two years) to recognize and count the number of site visitors as well as providing other information about the visit such as duration, route through the site and what sites the visitor came from. This information helps us to improve the way our Service works, for example by making sure users find what they need easily.

Click [here](#) for more information about GA cookies. Click [here](#) to opt out of Google Analytics.

## 3. What Do We Do with the Information?

Your Information will be used in the following ways:

- 3.1. **Performance of our contract with you.** We will use your Information to provide you with the Service under the Service Terms and Conditions.
- 3.2. **Legitimate business interests.** We will use your Information to improve our Service, to prevent or detect fraud or abuse, to personalise your user experience, to contact you in connection with the Service and any transactions

that you have initiated or completed, and to identify and authenticate your access to the parts of the Service that you are authorized to access.

Where your Information is needed to fulfil the Service under the Service Terms and Conditions, a failure to provide that information will prevent us from completing the transaction and we will refer you back to the specific Retailer.

- 3.3. Responding to Your Enquiries. We will use your designated email address and contact information for the legitimate purpose of responding to a "Contact Us" or administrative requests submitted by you.

#### **4. Sharing Your Information with Others.**

- 4.1. Transferring Information to Retailers. In connection with using our Service to make purchases we will share the Information that we collect from you (but with the exception of payment data such as credit card number details) with the specific Retailer who owns or operates the website from which you made your purchase.

Such Retailer will then be entitled to use your Information as if that Retailer has collected this information directly, subject to the Retailer's own privacy policy.

For instance, the Retailer needs to know that you have made a purchase in order to process delivery of your purchase, to handle any requests by you to return or replace a product and it needs to know if you are already a subscriber or member of its services so that you can take advantage of any loyalty scheme that it administers.

If you do not agree with the disclosure of your personal information to a third-party retailer, you will not be able to use the Service.

- 4.2. Marketing. While we do not use your Information for our own marketing purposes, we will disclose your Information for marketing purposes to the specific Retailer who owns or operates the website from which you made your purchase where you have provided your specific consent via our Service to receive its marketing materials by either email, telephone, text message or post.

In order to understand how the Retailer uses your Information you should read, understand and agree to its privacy notice and policies; we neither control nor are responsible for the policies of these retailers.

- 4.3. Using Affiliates to Store/Process Data. We will share your Information with our subsidiaries (including, but not limited to, Global-e Australia Pty. Ltd. if purchases are made from Australia) or affiliated companies for storing or processing such information on our behalf in connection with our provision of the Services. Such information will be transferred to other countries around the world where our or their servers and systems are located. Where you use our Services from Europe to make purchases, your data is stored on servers within the European Economic Area (EEA). In the event however We require that these parties agree to process such information in compliance with Global-e policies and procedures.

If we transfer Information outside the European Economic Area (EEA) we will comply with applicable laws relating to data transfers outside the EEA. It is important to note, however, that our website and Services are operated via servers situated in the EU.

Global-e accepts full responsibility for the protection of your Information, according to the applicable privacy legislation, the EU-U.S. Privacy Shield and this Policy, during these onward transfers to third parties.

- 4.4. Using Third Party Service Providers. We will share (in so far as such sharing is necessary) your Information with our third-party service providers (such as hosting providers, payment processors, anti-fraud service providers, licensed customs brokers, and order fulfilment providers) whose tools, software, and services we use to process and complete your transaction(s).

We use commercially reasonable efforts to ensure that such third-party service providers will only process your Information as part of providing the Service. Such third-party service providers are located in countries outside the EEA and if there is a transfer of Information outside the EEA we will comply with the applicable laws relating to data transfers outside the EEA.

- 4.5. Necessary Disclosure. We will disclose your Information or any information you submitted via the Services if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to:

- (i) comply with any applicable law, regulation, legal process or governmental request;
- (ii) enforce the Terms and Conditions, including investigations of potential violations thereof;

- (iii) detect, prevent, or otherwise address fraud or security issues; or,
- (iv) protect against harm to the rights, property or safety of Global-e, its users, yourself or the public.

## **5. Sharing Information in case of a Structural Change.**

We will disclose or transfer your Information if we are acquired by or merged with a third- party entity, or if we are bankrupted or liquidated. If we will use your Information or disclose for any purposes not covered in this Policy in this regard, then we will make efforts to ensure that you receive prior notification of the new purpose and where relevant, your consent obtained for those new purposes.

## **6. Adherence to the Privacy Shield Frameworks.**

We comply with the EU-US Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use and retention of Information transferred from the European Union to the United States. Global-e has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms of this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern.

To learn more about the Privacy Shield program and to view our certification, please visit <https://www.privacyshield.gov/>.

- 6.1. Resolution of Privacy Shield queries and complaint mechanism - In compliance with the Privacy Shield Principles, Global-e commits to resolve complaints about our collection or use of Information transferred pursuant to the Privacy Shield Framework. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact our Privacy officer at: [dataprotection@global-e.com](mailto:dataprotection@global-e.com).

Global-e has further committed to cooperate with EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning Information transferred from the EU. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact the EU DPAs for more information or to file a complaint. The services of the EU DPAs are provided at no cost.

- 6.2. Privacy Shield enforcement – Global-e is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC) with respect to specific EU Information received or transferred pursuant to the Privacy Shield Frameworks. In certain situations, Global-e will be required to disclose Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

## **7. Anonymous, Aggregated and Analytical Information.**

- 7.1. We may take steps to de-identify and make anonymous your personal information. In doing so we take steps to ensure that this data cannot be re-identified. We may use Anonymous Data in a number of ways to improve our Services or share it with third parties. In those case, we will do so without notice to you. We will also disclose Anonymous Data (with or without compensation) to third parties, including advertisers and partners.
- 7.2. "Anonymous Data" means information which does not enable identification of an individual user so that identification is irreversibly prevented, such as aggregated information about the use of our Service. Therefore, such information does not constitute "personal information" and use and disclosure of same does not affect any of your rights under US, EU, Canadian or other applicable privacy laws.

## **8. Your Choice.**

- 8.1. We request and collect minimal personal details that we need for the purposes described in this Policy. At any time, you may opt to terminate your use of the Service according to the Service Terms and Conditions (see section 8 - Consumer Cancellation Rights).

Thereafter, we will stop collecting any Information from you. However, we will store and continue using or making available certain Information that is related to you. For further information, please read the Security and Data Retention section in this Policy.

- 8.2. Web browsers offer a "Do Not Track" ("DNT") signal. A DNT signal is a HTTP header field indicating your preference for tracking your activities on the Service or through cross-site user tracking. Our Service responds to DNT signals.

## **9. Your California Privacy Rights.**

If you are a California resident, California Civil Code Section 1798.83 permits you to request in writing a list of the categories of Information relating to third parties to which We have disclosed certain categories of Information during the preceding year, for the third parties' direct marketing purposes. To make such a request, please contact us at: [dataprotection@global-e.com](mailto:dataprotection@global-e.com).

#### **10. Other Sites and Services.**

The Service will contain links to third party websites and services that are not owned or controlled by Global-e including third party payment providers. We are not responsible for the privacy practices or the content of third party websites or services and your use of or connection to such links and websites is at your sole risk. You should review their privacy policies.

#### **11. Children's Privacy.**

The Service is not structured to attract or be directed to children under the age of 16 years (for Canadian residents – 18). Accordingly, we do not intend to collect Information from anyone we know to be under 16 years (for Canadian residents – 18).

If we learn that we have collected Information from a child under 16 years (for Canadian residents – 18), we will delete that information quickly. If you believe that we have any such information, please contact us at: [dataprotection@global-e.com](mailto:dataprotection@global-e.com).

#### **12. Security and data retention.**

12.1. The security of Information is important to us. We follow generally accepted industry standards, including the use of appropriate administrative, physical and technical safeguards, to protect Information.

For example, certain sensitive Information (such as data relating to fraud) that we receive is processed over a Secure Sockets Layer channel and is encrypted; and our payment gateway is Payment Card Industry compliant. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure.

Therefore, while we strive to use generally accepted means to protect your Information, we cannot guarantee its absolute security or confidentiality. If you have any questions about security on the Service, you can contact us at: [dataprotection@global-e.com](mailto:dataprotection@global-e.com).

12.2. Your Information will be retained by us as necessary to and relevant to our Service Terms and Conditions and our legitimate operations, including time necessary to identify, issue or resolve legal proceedings, enforce our Service Terms and Conditions, to meet our reporting requirements and as otherwise required in accordance with applicable law obligations. In particular, your Information will be retained for the duration of the business/commercial relationship and then in accordance with the applicable statute of limitations – generally 6 years in the UK.

12.3. We will take appropriate steps to delete or permanently de-identify Information at the point this information is no longer needed by us for our legitimate business or legal obligations.

#### **13. Your Data Subject's rights.**

At any time, you can contact us at: [dataprotection@global-e.com](mailto:dataprotection@global-e.com) and request to access the Information that we keep about you. We will ask you to provide us certain credentials to make sure that you are who you claim to be and to the extent required under the applicable law, will make good-faith efforts to locate your Information that you request to access. If you find that the information on your account is not accurate, complete or up-to-date, please provide us the necessary information to correct it.

If you are eligible for the right of access under the applicable law, you can obtain confirmation from us of whether we are processing Information about you and receive a copy of that data, so that you could:

- verify its accuracy and the lawfulness of its processing;
- request the correction, amendment or deletion of your Information if it is inaccurate or if you believe that the processing of your Information is in violation of the applicable law or the Privacy Shield Principles (please see the EU-US Privacy Shield section in this policy for further information).

We will use judgement and due care to redact from the data which we will make available to you, Information related to others.

#### **14. Your EU Data Subject Rights.**

If EU data protection law applies to the processing of your Information that can directly or indirectly identify you, by Global-e, then the following terms apply:

- 14.1. Access the data that we keep about you. You have the right to obtain (i) confirmation as to whether Information concerning you are processed or not and, if processed, to obtain (ii) access to such Information and a copy thereof. We may need to ask you to provide us certain credentials to make sure that you are who you claim you are.
- 14.2. Rectify the Information that we keep about you. If you find that the data is not accurate, complete or updated, then you may provide us with the necessary information to rectify it.
- 14.3. Delete your Information. In some cases, you have the right to obtain the erasure of personal data concerning you. We may postpone or deny your request if your Information is in current use for providing our Services or to other legitimate purposes such as compliance with regulatory requirements associated with Global-e status as seller and exporter on record.
- 14.4. Restrict the processing of your Information. In some cases, you have the right to obtain restriction of the processing of your Information.
- 14.5. Transfer your Information in accordance with your right to data portability. You have the right to receive the Information concerning you which you have provided to us, in a structured, commonly used and machine-readable format, and you have the right to transmit that Information to another controller without hindrance from us. This right only applies when the processing of your Information is based on your consent or on a contract and such processing is carried out by automated means.
- 14.6. Object to the processing of your Information for direct marketing purposes. You have the right to object, on grounds relating to your particular situation, at any time to processing of Information concerning you when such processing is based on the legitimate interest of Global-e. Global-e may, however, invoke compelling legitimate grounds for continued processing. When your Information is processed for direct marketing purposes (by the Retailers), you have the right to object at any time to the processing of the Information for such purpose.

You have a right to lodge a complaint with a data protection supervisory authority of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR").

A summary and further details about your rights under EU data protection laws, is available on the EU Commission's website at: [https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens_en).

Note that when you send us a request to exercise your rights, we will need to reasonably authenticate your identity and location. We will ask you to provide us credentials to make sure that you are who you claim to be and will ask you further questions to understand the nature and scope of your request.

If we need to delete data following your request, it will take time until we completely delete residual copies of the data from our active servers and from our backup systems.

If you have any concerns about the way we process your Information, you are welcome to contact our privacy team at: [dataprotection@global-e.com](mailto:dataprotection@global-e.com). We will investigate your inquiry and make good-faith efforts to respond promptly.

#### **15. Dispute Resolution.**

We do periodical assessments of our data processing and privacy practices, to make sure that we comply with this policy, to update the policy when we believe that we need to, and to verify that we display the policy properly and in an accessible manner. If you have any concerns about the way we process your Information, you are welcome to contact our privacy team at: [dataprotection@global-e.com](mailto:dataprotection@global-e.com). We will investigate your query and make good-faith efforts to resolve any existing or potential dispute with you. If you remain unhappy with the response you received, you can also refer the matter to the UK Information Commissioner.

We have further committed to refer unresolved privacy complaints under the EU-US Privacy Shield Principles to the EU Data Protection Authorities. Please contact the EU Data Protection Authorities for more information and to file a complaint, at no charge. Further details, including in relation to filing a complaint is available on the Global-e Privacy Shield page at: <https://www.privacyshield.gov/participant?id=a2zt000000004ENIAA2&status=Active>.

Additionally, if you are an EU data subject, you can invoke binding arbitration in certain cases, as Annex I of the EU-U.S. Privacy Shield Agreement describes. For further information, please visit the Privacy Shield website at: [www.privacyshield.gov](http://www.privacyshield.gov), or contact our privacy team.

Additional information for residents of the following countries:

***Australia***

For the purposes of this Policy, “personal data” means any information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true, or opinion is recorded in a material form. We are committed to keeping your personal information secure and will use all reasonable precautions to protect it from loss, misuse or unauthorised access or alteration. However, except to the extent liability cannot be excluded due to the operation of statute, we exclude all liability (including in negligence) for the consequences of any unauthorised access to, disclosure of, misuse of or loss or corruption of your personal information. Nothing in this Privacy Notice restricts, excludes or modifies or purports to restrict, exclude or modify any statutory consumer rights under any applicable law including the Competition and Consumer Act 2010 (Cth). If you are unhappy with this Policy, you may submit a complaint to the Office of the Australian Information Commissioner.

***Hong Kong***

Terms used in this Policy shall have the meaning ascribed to them in the Personal Data (Privacy) Ordinance. Under the Personal Data (Privacy) Ordinance, individuals must be notified at the point of collection of the purposes for which the data was collected and thereafter the data can only be used for those purposes unless consent is obtained for a new purpose. If you are not happy with this Policy, you may submit a complaint to the Office of the Privacy Commissioner for Personal Data.

**16. Changes to this Privacy and Cookies Policy.**

From time to time, we will update this policy. If the updates have minor if any consequences, they will take effect 7 days after we post a notice on the Service's website. Substantial changes will be effective 30 days after we initially posted the notice.

Until the new policy takes effect, if it materially reduces the protection of your privacy right under the then-existing policy, you can choose not to accept it and terminate your use of the Service. Continuing to use the Service after the new policy takes effect means that you agree to the new policy. Note that if we need to adapt the policy to legal requirements, the new policy will become effective immediately or as required by law.

**17. Incorporation to the Terms of Use and Subscription Agreement.**

This Policy forms part of the terms and conditions of our Service.

**18. Contact Us.**

Please contact us at: [dataprotection@global-e.com](mailto:dataprotection@global-e.com) for further information.

In addition, you may contact our European representative, RICKERT Rechtsanwaltsgesellschaft m.b.H. Kaiserplatz 7 - 9, 53113 Bonn, Germany. Telephone No: 0049 228 74 898 0 Email: [kanzlei@rickert.net](mailto:kanzlei@rickert.net)

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