

## PRIVACY AND DATA PROCESSING STATEMENT - GO SECURE FILE

Version 2026 - EN/BE B2B

### 1. DATA CONTROLLER

Go Secure Dossier is a product of:

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Go Secure Dossier acts as a data controller within the meaning of Article 4 AVG.

### 2. APPLICATION

This declaration applies to the processing of personal data of business customers and contact persons (B2B).

### 3. CATEGORIES OF PERSONAL DATA

We only process personal data necessary for our services, including:

- Identification data (name, position, company name)
- Contact details (email address, phone number)
- Billing data (address, VAT number, payment information)
- Technical data (IP address, login details, timestamps, error messages).

We do not process any special categories of personal data.

### 4. PURPOSES AND LEGAL BASES

Personal data is processed for the following purposes:

- a. Access to and provision of digital services

Legal basis: performance of the contract

- b. Invoicing and administration

Legal basis: legal obligation and performance of agreement

- c. Security, fraud prevention and abuse detection

Legal basis: legitimate interest

- d. Technical management and optimisation

Legal basis: legitimate interest

### 5. OBLIGATION TO PROVIDE

The provision of certain personal data is necessary for the conclusion and performance of the agreement.

If this data is not provided, access to the service cannot be provided.

### 6. RETENTION PERIODS

- Tax and administrative data: 7-10 years in accordance with Portuguese law
- Account and contract data: for the duration of the agreement
- Technical logs: up to 12 months
- Backups: according to internally established rotation schedule

Data will not be kept longer than necessary.

### 7. PROCESSORS AND THIRD PARTIES

We use carefully selected processors, including:

- Hosting providers
- E-mail providers
- Payment providers

Processing agreements have been concluded with these parties in accordance with Article 28 AVG.

Personal data are not sold to third parties.

### 8. INTERNATIONAL TRANSFER

If personal data are processed outside the European Economic Area, this is done only on the basis of appropriate safeguards, such as standard contractual clauses or other mechanisms approved by the EU approved mechanisms.

### 9. SECURITY

Go Secure Dossier takes appropriate technical and organisational measures to

secure personal data against loss, unauthorised access or misuse.

In the event of a data leak that poses a risk to those involved, action will be taken in accordance with the data breach notification obligation of the AVG.

#### 10. RIGHTS OF DATA SUBJECTS

Data subjects have the right to:

- Inspection
- Rectification
- Deletion
- Restriction of processing
- Objection
- Data portability

Requests can be submitted at [dossier@goloko.net](mailto:dossier@goloko.net) stating “AVG request”.

We will respond within 30 days, unless an extension is granted by law.

#### 11. COMPLAINTS

If you believe that we are processing personal data unlawfully, you may lodge a complaint to:

Comissão Nacional de Proteção de Dados (CNPD), Portugal.

#### 12. COOKIES AND TECHNICAL LOGS

The website may generate functional and security-related technical logs (such as IP addresses and server logs).

No tracking cookies or profiling techniques are used unless otherwise stated.

#### 13. CHANGES

The most recent version of this statement will be published on the website.

The version in force at the time of entering into the agreement will be recorded digitally.