

## **PackControl – Privacy & Cookie Statement (2026 Edition)**

**Version: 2026 – 01**

**Effective Date: 1-1-2026**

PackControl B.V. ("PackControl", "we", "us") is committed to protecting your privacy and personal data. This Privacy & Cookie Statement explains how we collect, use, store, transfer, and secure personal data when you:

- visit our Website;
- use our cloud-based Software as a Customer or End User;
- participate in document signing or approvals using our Signing Service ("Approvals");
- use an external signing provider integrated in our platform;
- engage with us as an applicant or contact us.

PackControl processes personal data in accordance with the General Data Protection Regulation (GDPR), the Dutch Implementation Act (UAVG), the ePrivacy Directive, and other applicable laws.

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### **1. Contact Details**

PackControl B.V.  
Daalwijkdreef 47, 1103 AD Amsterdam  
The Netherlands  
Email: [privacy@packcontrol.nl](mailto:privacy@packcontrol.nl)  
Chamber of Commerce: 86427854

PackControl is not required to appoint a Data Protection Officer (DPO). All privacy-related inquiries can be sent to the address above.

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### **2. Roles Under the GDPR**

PackControl may act as:

#### **2.1 Data Processor**

For Customer Data stored or processed within the Software or Signing Service, PackControl acts as data processor on behalf of the Customer (the "data controller"). This includes:

- account data of End Users;
- operational data entered into the Software;
- signing metadata and documents processed through Approvals.

A **Data Processing Agreement (DPA)** governs these activities.

#### **2.2 Data Controller**

PackControl acts as a data controller when processing personal data for its own business purposes, including:

- website analytics and cookies;
  - customer support and CRM;
  - billing and administration;
  - security monitoring;
  - job applications.
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### **3. Categories of Personal Data We Process**

The personal data we may process depends on your interaction with our Services.

#### **3.1 Website Visitors**

- IP address
- Device, browser, and operating system information
- Cookie identifiers
- Interaction and click behaviour
- Pages visited

#### **3.2 Customers and End Users**

- First and last name
- Business email address
- Phone number
- Company name and role
- Account login data (email + hashed password)
- Support correspondence
- Audit logs and usage logs

#### **3.3 Signing Service Users (Approvals)**

When invited to sign or approve a document:

- Name and email address
- IP address
- Authentication method used
- Timestamp of signing events
- Signing status (completed, rejected, pending)

- Document identifiers
- Technical verification metadata

### **3.4 External Signing Providers**

When an external signing provider (e.g., ValidSign) is used:

- Additional categories of personal data may be processed under their independent privacy policy.

### **3.5 Applicants**

- Name, address, and contact details
- CV and cover letter
- Qualifications and work history
- References
- Interview notes
- Any additional information provided

### **3.6 Indirectly Collected Data (Logs)**

We also process automatically collected log data:

- API requests
- Session identifiers
- Security and fraud indicators
- Server logs and error logs

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## **4. Purposes and Legal Bases**

PackControl processes personal data for the purposes below.

### **4.1 To Provide Our Services**

**Legal basis:** performance of contract

- Creating and managing Accounts
- Enabling use of the Software
- Facilitating electronic signing and approvals
- Processing audit trails and verification metadata

### **4.2 To Improve and Secure the Services**

**Legal basis:** legitimate interest

- Service performance monitoring

- Preventing misuse or fraud
- Debugging, diagnostics, and analytics
- Ensuring the security of our platform

PackControl maintains a **Legitimate Interest Assessment (LIA)**. You may request access to it.

#### **4.3 To Communicate With You**

**Legal basis:** performance of contract or legitimate interest

- Support and troubleshooting
- Service notifications
- Account and security alerts

#### **4.4 For Legal Obligations**

**Legal basis:** compliance with law

- Tax and accounting requirements
- Mandatory retention rules

#### **4.5 With Your Consent**

**Legal basis:** consent

- Certain marketing communications
- Optional analytics or marketing cookies

You may withdraw consent at any time.

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### **5. The Signing Service (Approvals)**

PackControl processes limited signatory data to facilitate secure, verifiable signing workflows.

#### **5.1 Types of Data Processed**

- Name and email address
- IP address
- Authentication mechanism
- Signing timestamps
- Document identifiers
- Technical signing metadata

#### **5.2 Purpose of Processing**

- Enabling the signing workflow
- Securing and validating signing events

- Creating audit trails
- Ensuring technical integrity of approvals

### 5.3 Roles Under GDPR

PackControl acts as **data processor**; the Customer is **data controller**. Customers are responsible for:

- determining the legal basis for signing;
- providing required notifications to signatories;
- defining retention periods.

### 5.4 External Signing Providers

When Customers integrate external signing providers:

- those providers may independently process personal data;
- their processing is governed by their own privacy statements.

### 5.5 Retention

Signing metadata is retained only as long as required under the Agreement or the Customer's instructions.

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## 6. Recipients of Personal Data

We may share personal data with:

- Hosting and infrastructure providers
- Communication and email providers
- Customer support tools
- Signing service providers
- CRM and billing systems
- Payment processors
- IT security and monitoring providers
- External service providers engaged by Customers
- Legal authorities when legally required

We **do not sell or rent** personal data.

A full list of sub-processors is available upon request.

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## 7. Sub-Processors

When acting as a processor, PackControl engages sub-processors to support the delivery of our Services.

- Customers will be notified of changes to sub-processors.
  - Customers may object to sub-processors where permitted under the DPA.
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## 8. International Transfers

Personal data is primarily processed within the **European Union**. If transfers outside the EEA occur, we apply:

- EU Standard Contractual Clauses (SCCs)
  - Adequacy decisions
  - Additional safeguards where appropriate
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## 9. Cookies

PackControl uses cookies for:

- Essential website functionality
- Analytics (configured to be privacy-friendly)
- Optional marketing cookies (only with consent)

Upon your first visit, you may accept or decline non-essential cookies. You may withdraw consent at any time via our cookie settings.

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## 10. Security Measures

We implement appropriate technical and organisational measures, including:

- Encryption in transit and at rest
  - Role-based and least-privilege access controls
  - Logging and monitoring
  - Regular security testing and audits
  - Network segmentation and firewalls
  - Continuous vulnerability management
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## 11. Retention Periods

We retain personal data no longer than necessary for the purposes described.

Category	Retention
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Customer account data	Contract duration + 7 years
Signing metadata	As instructed by Customer
Support tickets	Up to 3 years
Security logs	Up to 12 months
Backup data	Up to 90 days
Applicant data	6 weeks after rejection (or 1 year with consent)
Website analytics	As defined by cookie configuration
CRM and contact form data 1–2 years	

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## 12. Automated Decision-Making

PackControl does **not** use automated decision-making or profiling that produces legal or similarly significant effects under Article 22 GDPR. Automated security monitoring may be used to detect misuse or fraud, but these processes do not materially affect your rights.

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## 13. Your Rights

You may exercise the following rights under GDPR:

- Right of access
- Right to rectification
- Right to erasure (“right to be forgotten”)
- Right to restriction of processing
- Right to data portability
- Right to object (including to legitimate interest processing)
- Right to withdraw consent

Requests can be submitted to [privacy@packcontrol.nl](mailto:privacy@packcontrol.nl). We may ask you to verify your identity.

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## 14. Data Breaches

If a personal data breach occurs involving Customer Data, PackControl will notify the Customer **without undue delay**, in accordance with Article 33 GDPR.

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## 15. Children’s Privacy

PackControl does not knowingly process personal data of children under 16. Our Services are intended for business users only.

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## **16. Changes to This Statement**

We may update this Statement from time to time. The latest version will always be published on our Website.

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## **17. Complaints**

If you have concerns about our processing of personal data, please contact us first. You also have the right to file a complaint with the **Dutch Data Protection Authority (Autoriteit Persoonsgegevens)**.

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