Privacy Policy

1. Introduction

Welcome to Tubeway.io ("we", "our", "us"). We value your privacy and are committed to protecting your personal data. This Privacy Policy explains how we collect, use, and protect your information when you visit our website at https://www.tubeway.io (the "Website").

This policy complies with the **General Data Protection Regulation (EU) 2016/679 (GDPR)** and the **Dutch GDPR Implementation Act (UAVG)**.

2. Who We Are

Data Controller: Video Bee BV Naarderweg 16 1217 GL Hilversum The Netherlands

KvK-number: 82046336 Email: info@tubeway.io

3. What Data We Collect

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

a) Information You Provide

- Name, email address, and contact details (e.g., via forms or comments)
- Account information (if registration is enabled)
- Payment details (processed via third-party providers)

b) Automatically Collected Data

- IP address
- Browser type and version
- Device and operating system
- Referrer URL
- Pages visited and time spent
- Cookies and tracking technologies (see Section 7)

c) Special Categories of Data

We do not intentionally collect any special categories of personal data (e.g., race, religion, health).

4. How We Use Your Data

We use your personal data for the following purposes:

- To respond to your inquiries or contact requests
- To provide services and customer support
- To improve our website and services
- To manage user accounts (if applicable)
- To comply with legal obligations
- To send newsletters or updates (only with your consent)

5. Legal Bases for Processing

We process your data based on one or more of the following legal grounds:

- **Consent** (Art. 6(1)(a) GDPR): e.g., newsletter subscriptions
- **Contractual necessity** (Art. 6(1)(b)): e.g., when you place an order
- Legal obligation (Art. 6(1)(c)): e.g., invoicing and tax
- Legitimate interest (Art. 6(1)(f)): e.g., improving website security

6. Who We Share Your Data With

We do **not** sell your personal data. However, we may share your data with trusted third parties such as:

- Hosting providers (e.g., SiteGround, Cloudways)
- **Analytics services** (e.g., Google Analytics IP anonymized)
- Email services (e.g., Mailchimp, Brevo)
- Payment processors (e.g., Mollie, Stripe)
- **Security tools** (e.g., Wordfence, reCAPTCHA)

All our third-party service providers are GDPR-compliant and only process your data according to our instructions.

7. Cookies & Tracking

We use cookies and similar technologies for functionality, analytics, and marketing.

Types of Cookies:

- **Essential**: Required for website functionality (e.g., login sessions)
- Analytics: Help us understand how visitors use our site
- Marketing: Used for ad targeting or retargeting

You can manage or withdraw your cookie consent at any time via our cookie banner or your browser settings.

See our <u>Cookie Policy</u> for details.

8. Data Retention

We retain your personal data:

- Only as long as necessary for the purposes described
- As required by law (e.g., 7 years for tax records)
- Until you request deletion (subject to legal exceptions)

Inactive accounts may be removed after 24 months.

9. Data Security

We use appropriate technical and organizational measures to protect your data, including:

- SSL encryption
- Firewall and malware protection (e.g., Wordfence)
- Secure backups
- Limited access for personnel with 2FA

10. Your Rights (Under GDPR)

You have the following rights:

- Right to access your data
- Right to rectification
- Right to erasure ("right to be forgotten")
- Right to restrict processing
- Right to data portability
- Right to object
- Right to withdraw consent

You can exercise your rights by contacting us at [Your Contact Email]. You also have the right to lodge a complaint with the **Autoriteit Persoonsgegevens (Dutch DPA)**.

11. International Transfers

We do not transfer your data outside the European Economic Area (EEA) unless:

- The recipient is in a country with adequate protection (e.g., EU-U.S. Data Privacy Framework)
- Appropriate safeguards are in place (e.g., SCCs)

12. Children

Our website is not intended for children under 16. We do not knowingly collect data from minors.

13. Changes to This Policy

We may update this Privacy Policy from time to time. The latest version will always be available at: https://www.tubeway.io/privacy-policy

Last updated: 02-06-2025

14. Contact Us

If you have any questions or concerns about this policy or how we handle your data, please contact us:

Email: info@tubway.io