
LEGAL DOCUMENT

Privacy Notice

How Claeritas collects, uses, and protects personal data

COMPANY**Claeritas**

Papaverweg 34, Unit B100

1032 KJ Amsterdam

The Netherlands

www.claeritas.com

contact@claeritas.com

KvK 42108731 · VAT NL005500251B18

VERSION

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This Privacy Notice explains how **Claeritas** ("we", "our", "us") processes personal data of visitors to www.claeritas.com, recipients of our business outreach, prospective clients, clients, suppliers, and other individuals we interact with in the course of our services.

We are a Dutch sole proprietorship (eenmanszaak) under Dutch law specialised in CITES permit applications and EU trade compliance advisory. Our founder, Maya Mercelina, is the person responsible for privacy matters and is reachable at contact@claeritas.com.

This notice is issued under the EU General Data Protection Regulation (GDPR, Regulation (EU) 2016/679) and the Dutch GDPR Implementation Act (UAVG).

1. Who we are (controller)

Controller	Claeritas
Legal form	sole proprietorship (eenmanszaak) under Dutch law
Address	Papaverweg 34, Unit B100, 1032 KJ Amsterdam, The Netherlands
KvK number	42108731
VAT number	NL005500251B18
Website	www.claeritas.com
Contact for privacy matters	contact@claeritas.com

Data Protection Officer (DPO)

Not appointed. Appointment is not required under Article 37 GDPR, as our core activities do not involve large-scale, regular and systematic monitoring of individuals or large-scale processing of special categories of personal data.

2. What personal data we process, and why

2.1 Website visitors

When you visit our website, we may process:

- **Technical data:** IP address, browser type, device type, pages visited, referrer, timestamps.
- **Cookie and analytics data:** only after you have given consent — see our separate Cookie Notice.
- **Contact form data:** name, business email, company name, message content — only if you voluntarily submit a form.

Purpose: to operate the website, ensure security, understand usage, and respond to your enquiries.

Legal basis: legitimate interest (Article 6(1)(f) GDPR) for operating and securing the website; consent (Article 6(1)(a) GDPR) for analytics and other non-essential cookies; performance of a (pre-)contractual measure (Article 6(1)(b) GDPR) if you request information about our services.

2.2 Business outreach recipients

We conduct professional B2B outreach to individuals whose role and employer suggest a plausible interest in EU trade compliance or CITES permitting.

We process:

- **Identity data:** name, job title, employer.
- **Business contact data:** business email address, business phone number, LinkedIn URL.
- **Contextual data:** publicly available information about the company's trade activity (e.g., product category, EU footprint).

Source of the data: professional records, business registers, company websites, LinkedIn, and other publicly available business sources.

Purpose: to inform a limited number of relevant business contacts about our services.

Legal basis: legitimate interest (Article 6(1)(f) GDPR). We have documented a balancing test that weighs our commercial interest and the low-intrusion nature of B2B outreach against the recipient's reasonable expectations. Recipients can object at any time (see section 7).

2.3 Clients and prospective clients

When you engage with us or request a proposal, we process:

- **Contact data of company representatives:** name, role, business email, business phone.
- **Company data:** legal name, KvK/registration number, VAT number, business address.
- **Compliance file data:** the information you provide us to prepare a CITES application or compliance file. Where this contains personal data, it is generally limited to the names and business contact details of the individuals designated on the permit (e.g., authorised signatory, responsible person).
- **Correspondence and file notes:** emails, meeting notes, uploaded documents.

- **Financial data:** invoicing details, payment records.

Purpose: to provide the agreed services, manage the client relationship, invoice, and comply with our legal obligations (bookkeeping, tax, anti-money-laundering to the extent applicable).

Legal basis: performance of a contract (Article 6(1)(b) GDPR); legal obligation (Article 6(1)(c) GDPR) for bookkeeping and tax retention; legitimate interest (Article 6(1)(f) GDPR) for internal administration.

2.4 Suppliers and partners

Business contact details, correspondence and invoicing data of individuals working for our suppliers, subcontractors, and referral partners.

Legal basis: performance of a contract; legitimate interest.

3. Categories of recipients

We share personal data only with parties that need it to enable our services or that we are legally obliged to share with:

- **Dutch Enterprise Agency (RVO.nl)** — the competent authority for CITES permit applications in the Netherlands. Sharing applicant and permit-holder details is inherent to the service.
- **Dutch Customs (Douane)** — where relevant to trade compliance advisory.
- **Our processors** — cloud-based providers we use to operate our business, listed in section 4.
- **Our accountant, tax advisor, and legal advisors** — bound by professional confidentiality.
- **Competent authorities** — where legally required (e.g., tax authorities, law enforcement upon lawful request).

We do not sell personal data. We do not use personal data for automated decision-making with legal or similarly significant effects.

4. Our service providers

We use the following service providers to run our business. Where the GDPR requires it, we have a data processing agreement in place with each of them.

Microsoft (Microsoft 365)	Email, document storage, collaboration — EU/EEA storage where available.
SuiteDash	Client portal, intake forms, project management.
Moneybird	Accounting and invoicing (Dutch provider).
Wise / Payoneer	International payments to contractors.
Website hosting provider	Hosting and technical management of www.claeritas.com .
Google (Google Analytics 4)	Website statistics — only after you have given consent via our cookie banner.
Google Fonts and unpkg.com	Delivery of fonts and a script library for the website. Your browser connects directly to these providers, which receive your IP address for this purpose.

5. International transfers

Some of our service providers are established outside the EU/EEA or may access personal data from there (for example Microsoft, Google, SuiteDash and Payoneer). Such transfers take place only on the basis of an adequacy decision of the

European Commission — such as the EU-U.S. Data Privacy Framework for providers certified under it — or on the basis of the European Commission's Standard Contractual Clauses, supplemented by additional measures where necessary.

6. Retention periods

We do not keep personal data longer than necessary. Our default periods are:

Website contact form submissions	Up to 12 months after last contact.
Outreach contact lists (no engagement)	Up to 12 months from last outreach touchpoint.
Outreach contact lists (engaged prospects)	Up to 24 months, or until you object.
Client files (CITES and compliance)	7 years after the end of the engagement (statutory retention under Dutch tax law and for potential CITES audit).
Accounting records	7 years (statutory).
Correspondence not tied to a client file	Up to 24 months.

Longer retention may apply where required by law or where relevant to establishing, exercising, or defending legal claims.

7. Your rights

Under the GDPR you have the following rights:

- **Access** — to receive a copy of the personal data we hold about you.
- **Rectification** — to have inaccurate data corrected.
- **Erasure** — to have your data deleted, subject to legal retention obligations.
- **Restriction** — to limit our processing in specific circumstances.
- **Portability** — to receive your data in a structured, commonly used, machine-readable format.
- **Objection** — to object to processing based on legitimate interest, including direct marketing. When you object to direct marketing (including our outreach), we will stop processing your data for that purpose without delay.
- **Withdraw consent** — where processing is based on consent, at any time, without affecting the lawfulness of processing before withdrawal.

To exercise any of these rights, contact us at contact@claeritas.com. We will respond within one month (extendable by two months for complex requests). We may ask for reasonable proof of identity.

You also have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) — see www.autoriteitpersoonsgegevens.nl.

8. Security

We take appropriate technical and organisational measures to protect personal data, including access controls, encryption in transit, multi-factor authentication on business accounts, regular software updates, and a documented incident-response process. In the event of a personal data breach with risk to individuals, we will notify the Dutch DPA within 72 hours and affected individuals without undue delay, as required by Articles 33 and 34 GDPR.

9. Cookies

Our website uses cookies and similar technologies. See our separate Cookie Notice for details.

10. Changes to this notice

We may update this Privacy Notice from time to time. Material changes will be announced on our website and, where appropriate, communicated directly. The version number and effective date at the top of this document indicate when it was last updated.

11. Contact

Questions about this notice or about how we process your personal data? Contact us at contact@claeritas.com or by post at Papaverweg 34, Unit B100, 1032 KJ Amsterdam, The Netherlands.