



COMPANY DOCUMENT

# Privacy Statement

*How we process personal data when you visit our website, contact us, or subscribe to our newsletter.*

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<i>Version</i>	1 May 2026
<i>Effective from</i>	1 May 2026
<i>Website</i>	<a href="http://www.2scalealliances.com">www.2scalealliances.com</a>

## 1 Introduction

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This privacy statement describes how 2Scale Alliances (hereafter: "we", "us", "2SA") processes personal data when you visit our website [www.2scalealliances.com](http://www.2scalealliances.com), fill in our contact form, subscribe to our newsletter, or otherwise interact with us.

We take the careful handling of personal data seriously and comply with the General Data Protection Regulation (GDPR) and, for visitors from the United Kingdom, the UK GDPR.

## 2 Who is the data controller?

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The controller responsible for processing your personal data is:

<i>Name</i>	2Scale Alliances B.V.
<i>Trading name</i>	2Scale Alliances
<i>Legal form</i>	Besloten Vennootschap (B.V.), incorporated under Dutch law
<i>Registered address</i>	Oosterbroek 7, 2641 MJ Pijnacker, the Netherlands
<i>Website</i>	<a href="http://www.2scalealliances.com">www.2scalealliances.com</a>
<i>Privacy enquiries</i>	<a href="mailto:privacy@2scalealliances.com">privacy@2scalealliances.com</a>

For questions, requests, or complaints about this privacy statement or about the processing of your personal data, please contact us via the email address above.

## 3 What personal data do we process?

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Depending on how you interact with us, we process the following categories of personal data.

### *When you visit the website*

- Technical data necessary for the operation of the website, including IP address, browser type, device and operating system information, and pages visited.
- Aggregated, anonymised usage statistics through Vercel Web Analytics.

#### *When you use the contact form*

- Name, organisation, email address, telephone number (if provided), and the content of your message.

#### *When you subscribe to the newsletter*

- Email address, and optionally name and organisation.
- Subscription data: date and time of subscription, IP address at subscription, double opt-in confirmation, and date of unsubscription.
- Engagement data: whether you open our newsletter (open rate). We do not track clicks on individual links.

#### *When you have a business relationship with us (client or prospect)*

- Contact details, role, organisation details, communication history, and notes for the purposes of relationship management in our CRM system.

## 4 Purposes and lawful bases

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We process your personal data only for the purposes set out below and on the lawful basis indicated for each, as required by Article 6 GDPR.

### **Operating and securing the website**

Technical operation, security, and stability.

*Lawful basis: legitimate interest (Article 6(1)(f) GDPR) in providing a working and secure website.*

### **Responding to enquiries via the contact form or email**

Answering your enquiry and any necessary follow-up.

*Lawful basis: performance of a (pre-)contractual relationship (Article 6(1)(b) GDPR) or legitimate interest (Article 6(1)(f) GDPR).*

### **Sending our newsletter**

Informing and engaging you with developments, insights, and services from 2SA in the area of partner and alliance ecosystems.

*Lawful basis: your explicit consent (Article 6(1)(a) GDPR), confirmed via double opt-in. You may withdraw your consent at any time.*

### **Measuring open rates and profiling within the newsletter**

Measuring whether newsletters are opened and using this to assess which topics are relevant to our recipients, so that we can improve content.

*Lawful basis: your consent at newsletter subscription (Article 6(1)(a) GDPR). We do not make any automated decisions based on this profiling that produce legal effects or similarly significant effects on you.*

### **Managing business contacts and CRM**

Relationship management, follow-up on proposals, and administration of clients and prospects.

*Lawful basis: performance of a contract (Article 6(1)(b) GDPR) or legitimate interest in business relationship management in a B2B context (Article 6(1)(f) GDPR).*

### **Compliance with legal obligations**

Meeting obligations such as tax retention requirements or requests from competent authorities.

*Lawful basis: legal obligation (Article 6(1)(c) GDPR).*

## 5 Newsletter: how it works

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Our newsletter is sent approximately once every 30 days. Subscription uses a double opt-in process: after you subscribe, you receive a confirmation email with a verification link. Your email address is added to the mailing list only after you click that link.

We measure whether you open our newsletter and use this information to form a general picture of your interests. We do not measure which links you click. Open rates are not used for active commercial follow-up by our sales team.

You may unsubscribe at any time and free of charge using the unsubscribe link at the bottom of every newsletter, or by sending a message to [privacy@2scalealliances.com](mailto:privacy@2scalealliances.com). After unsubscription, we remove your data from the active mailing list.

## 6 Cookies and similar technologies

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On [www.2scalealliances.com](http://www.2scalealliances.com), we do **not** place any tracking, analytics, or marketing cookies that require consent.

In limited cases, our hosting provider Vercel may place functional cookies or similar technologies, for example for session management, load balancing, and security at the hosting layer. In addition, functional application cookies may be used, for example to remember language preference or form progress. These cookies are

strictly necessary for the operation of the website and fall under the consent exemption set out in Article 11.7a(3) of the Dutch Telecommunications Act (and the equivalent exemption in Regulation 6(4) of the UK Privacy and Electronic Communications Regulations); no consent is required for these cookies.

For website statistics, we use **Vercel Web Analytics**, which operates without cookies and without uniquely identifiable user IDs. Vercel collects aggregated, anonymised data on page visits.

## 7 Who do we share your data with?

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We share your personal data with third parties only where this is necessary for the purposes set out above or where we are legally required to do so. We enter into data processing agreements with parties that process personal data on our behalf (processors).

We use the following categories of recipients:

- **Hosting provider:** Vercel Inc. (United States), for the technical provision through a global edge network and security of the website. We have a Data Processing Addendum with Vercel under which Vercel acts as processor for data of visitors to our website. Vercel collects country and city information based on IP address, but no precise location data.
- **Newsletter software:** MailerLite (MailerLite, Inc., United States, with group entities in Lithuania and Ireland), for managing subscriptions, unsubscriptions, and sending the newsletter. MailerLite processes data on infrastructure provided by Google Ireland Limited, with data centres within the European Union (the Netherlands and Germany). We have a Data Processing Addendum with MailerLite, which is automatically in force through MailerLite's terms of use.
- **CRM system:** HubSpot (HubSpot, Inc., United States, with EU entity HubSpot Ireland Limited), for managing business contacts and client relationships. We have a Data Processing Addendum with HubSpot under which HubSpot acts as processor for the contact data we store in HubSpot; this DPA forms part of the HubSpot Customer Terms of Service and incorporates the EU Standard Contractual Clauses. Our HubSpot account is configured for EU hosting; the actual storage and processing of client data takes place on AWS infrastructure in Frankfurt, Germany.
- **Analytics service:** Vercel Web Analytics. If we adopt additional analytics services in the future, we will update this statement before doing so.
- **Other professional service providers:** administrative, tax, or legal advisers, where necessary.
- **Competent authorities:** where we are legally required to share data with them.

MailerLite in turn engages the following sub-processors: Google Ireland Limited (Ireland) for hosting the service in data centres in the Netherlands and Germany, and Vercom S.A. (Poland) as a shareholder involved in the management and further development of the service.

## 8 Transfers outside the EEA and the United Kingdom

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Some of our processors are established outside the European Economic Area (EEA) or have parent entities outside the EEA:

- **Vercel Inc.** is based in the United States. Vercel provides its services through a global edge network and may process data inside and outside the EEA. Vercel is certified under the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework, and the Swiss-U.S. Data Privacy Framework. Transfers of personal data to Vercel in the United States take place on this basis.
- **MailerLite, Inc.** is based in the United States, with group entities in Lithuania and Ireland. The actual processing and storage of personal data takes place on infrastructure operated by Google Ireland Limited within the European Union (data centres in the Netherlands and Germany). Where data is nonetheless processed outside the EEA — for example for support or administration by the US entity — this is covered by the Standard Contractual Clauses that form an integral part of MailerLite's Data Processing Addendum.
- **HubSpot, Inc.** is based in the United States, with EU entity HubSpot Ireland Limited. Our HubSpot account is configured for EU hosting; the actual processing and storage of our contact data takes place on AWS infrastructure in Frankfurt, Germany. Where data is nonetheless processed outside the EEA — for example for support or administration by the US entity — this is covered by the Standard Contractual Clauses set out in the HubSpot Data Processing Agreement.

For transfers to the United States we rely, where applicable, on the EU-U.S. Data Privacy Framework where the relevant processor is certified under it, and additionally on the European Commission's Standard Contractual Clauses, supplemented by appropriate additional safeguards where necessary. For visitors from the United Kingdom, equivalent safeguards apply under the UK International Data Transfer Agreement or the UK Addendum to the Standard Contractual Clauses.

You may request more information on the safeguards in place by contacting [privacy@2scalealliances.com](mailto:privacy@2scalealliances.com).

## 9 Retention periods

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We do not retain your personal data longer than necessary for the purposes for which it is processed or as required by law.

Data	Retention period
Newsletter data (mailing list)	For as long as you are subscribed. After unsubscription, your data is removed from the active mailing list.
Evidence of consent and unsubscription	Up to 3 years after unsubscription, to demonstrate that consent was given and correctly processed.
Contact form data	Up to 12 months after your enquiry has been handled, unless this leads to a client relationship, proposal request, or contract.
Client and relationship data (CRM)	For the duration of the relationship and thereafter for as long as is necessary for administration, service, contractual obligations, or statutory retention requirements.
Financial and administrative data	7 years (Dutch tax retention requirement).
Log files and security data	Up to 6 months.

## 10 Security

We take appropriate technical and organisational measures to protect your personal data against loss, misuse, and unauthorised access. Our website and the services we use are secured through, among other measures, TLS encryption, access control, secure authentication, and periodic review of our security measures.

## 11 Your rights

Under the GDPR (and, where applicable, the UK GDPR), you have the following rights in relation to your personal data:

- the right of access to your personal data (Article 15 GDPR);
- the right to rectification of inaccurate or incomplete data (Article 16 GDPR);
- the right to erasure of your data, where we are not legally required to retain it (Article 17 GDPR);
- the right to restriction of processing (Article 18 GDPR);
- the right to data portability (Article 20 GDPR);

- the right to object to processing based on legitimate interest (Article 21 GDPR);
- the right to withdraw your consent at any time, without affecting the lawfulness of processing carried out before withdrawal (Article 7(3) GDPR).

You may exercise your rights by sending a request to [privacy@2scalealliances.com](mailto:privacy@2scalealliances.com). We may ask you to substantiate your request or to verify your identity before we process it. We will normally respond to your request within one month.

If you are not satisfied with how we handle your personal data, you have the right to lodge a complaint with a supervisory authority:

- in the United Kingdom: the Information Commissioner's Office ([ico.org.uk](http://ico.org.uk));
- in the Netherlands: the Autoriteit Persoonsgegevens ([autoriteitpersoonsgegevens.nl](http://autoriteitpersoonsgegevens.nl)), which acts as our lead supervisory authority within the EU one-stop-shop mechanism;
- in Germany: your competent Landesdatenschutzbeauftragte or the Bundesbeauftragte für den Datenschutz und die Informationsfreiheit ([bfdi.bund.de](http://bfdi.bund.de));
- in Belgium: the Gegevensbeschermingsautoriteit ([gegevensbeschermingsautoriteit.be](http://gegevensbeschermingsautoriteit.be));
- in Luxembourg: the Commission nationale pour la protection des données ([cnpd.lu](http://cnpd.lu)).

## 12 Changes to this statement

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We may update this privacy statement from time to time, for example because of changes to our services, the tools we use, or applicable laws and regulations. The most current version is always available at [www.2scalealliances.com](http://www.2scalealliances.com).