

PRIVACY STATEMENT SECOND OWNER B.V. & SECOND OWNER AUCTIONS B.V.

Date: May 2026

Article 1. Data Controller

1.1. Second Owner B.V. and Second Owner Auctions B.V. (hereinafter jointly referred to as: “Second Owner”), having their registered office at (6603 AS) Wijchen, Havenweg 6-8, registered with the Chamber of Commerce under numbers 78457823 and 84654988, are the joint controllers within the meaning of the General Data Protection Regulation (hereinafter: “GDPR”) for the processing of personal data as described in this chapter.

1.2. The provisions of this chapter apply to all processing of personal data in the context of the business activities of Second Owner, including but not limited to the trade in machinery, (international) sales processes, service provision, relationship management, and website use.

1.3. Contact details Second Owner:

- Email: [info@secondowner.com]
- Telephone: [0031614832789]
- Postal address: Havenweg 6-8, 6603 AS Wijchen

Article 2. Categories of Personal Data

2.1. In the context of its services, Second Owner processes personal data of (prospective) clients, customers, suppliers, website visitors, and other business relations. Second Owner processes, inter alia, the following categories of personal data:

- a. name, company name, and contact details (including email address and telephone number);
- b. job title and other business-related data;
- c. correspondence and communication data (including emails, quotations, and other correspondence);
- d. financial and transaction data (including invoicing and payment details);
- e. website behaviour and IP address;
- f. data obtained via external tools, including Leadinfo B.V. (hereinafter: “Leadinfo”).

2.2. Second Owner collects personal data in the following ways:

- a. when the data subject has provided such personal data directly to Second Owner, for example via the website, a contact form, or by email;
- b. when the data subject contacts Second Owner with a request for information regarding Second Owner’s services or products;
- c. when the data subject enters into an agreement or assigns an order to Second Owner;
- d. when data is generated through the use of the Second Owner website, including via

cookies and similar technologies;

e. via third parties, including business partners, external platforms, or lead generation services such as Leadinfo.

2.3. The provision of personal data by the data subject is necessary insofar as it concerns:

a. the conclusion and performance of an agreement: without such data, Second Owner cannot conclude or perform the agreement;

b. compliance with legal obligations (fiscal data): Second Owner is legally required to process such data.

2.4. The provision of personal data for marketing purposes is voluntary. Failure to grant consent has no consequences for access to the website or the conclusion of agreements with Second Owner.

Article 3. Processing of Personal Data

3.1. Second Owner processes personal data solely for the following purposes and on the following legal bases as referred to in Article 6(1) GDPR:

a. the execution and settlement of agreements, including preparing quotations, invoicing, delivery, and handling of transactions (legal basis: performance of a contract, Article 6(1)(b) GDPR);

b. compliance with legal obligations, including fiscal and accounting retention obligations (legal basis: legal obligation, Article 6(1)(c) GDPR);

c. sending newsletters and commercial communications, exclusively after explicit prior consent of the data subject (legal basis: consent, Article 6(1)(a) GDPR);

d. improving the website and services based on analytical data, as well as commercial activities, relationship management, and fraud prevention (legal basis: legitimate interest, Article 6(1)(f) GDPR). For each processing based on legitimate interest, Second Owner has conducted a balancing test, assessing whether the interests or the fundamental rights and freedoms of the data subject do not override the interests of Second Owner;

e. lead generation and identification of business visitors to the website via Leadinfo, as well as the placement of marketing cookies, exclusively after prior consent given via the cookie banner (legal basis: consent, Article 6(1)(a) GDPR).

Article 4. Sharing Personal Data with Third Parties

4.1. Second Owner shares personal data with third parties only insofar as this is necessary for the aforementioned purposes or on the basis of a legal obligation.

Personal data may be shared with the following categories of recipients:

- a. CRM providers for relationship management and account management;
- b. marketing and analytics tools for lead generation and website analysis;
- c. IT and hosting providers for the management and security of IT systems;
- d. logistics and transport providers for the delivery of goods in (international) trade;
- e. financial service providers and accountants for financial administration;
- f. government authorities and supervisory bodies, insofar as legally required.

4.2. Insofar as the aforementioned recipients qualify as processors within the meaning of the GDPR, Second Owner enters into appropriate data processing agreements with these parties.

Article 5. Transfers Outside the EEA

5.1. In the context of international trade, personal data may be processed outside the European Economic Area (hereinafter: “EEA”). In such cases, Second Owner ensures that appropriate safeguards are in place, such as entering into standard contractual clauses approved by the European Commission or relying on an adequacy decision of the European Commission. The counterparty may request information from Second Owner regarding the specific safeguards implemented.

Article 6. Retention Periods

6.1. Second Owner does not retain personal data longer than necessary for the purposes for which it was collected, taking into account applicable statutory retention periods. The following retention periods apply:

- a. data for the performance of agreements: during the term of the agreement and two years thereafter, unless longer retention is legally required;
 - b. fiscal and accounting data: for seven years after the end of the financial year in which the relevant transaction took place, in accordance with statutory fiscal retention obligations;
 - c. data for marketing and relationship management: as long as the business relationship is active or until the data subject objects or withdraws consent;
 - d. international trade documentation: in accordance with applicable statutory retention periods for export and customs documentation.
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Article 7. Security Measures

7.1. Second Owner implements appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction, or damage. These measures include, inter alia:

- a. access control and authorisation systems;
 - b. secure IT systems and encrypted connections;
 - c. periodic checks, monitoring, and updates of security measures.
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Article 8. Data Subject Rights

8.1. Under the GDPR, data subjects have the following rights:

- right of access (Article 15 GDPR);
- right to rectification (Article 16 GDPR);
- right to erasure (Article 17 GDPR);
- right to restriction of processing (Article 18 GDPR);
- right to data portability (Article 20 GDPR);
- right to object to processing based on legitimate interest (Article 21 GDPR);
- right to object to the processing of personal data for direct marketing purposes (Article 21(2) GDPR).

8.2. Insofar as processing is based on the consent of the data subject, the data subject has the right to withdraw such consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal. Withdrawal of consent is as easy as giving it.

8.3. Requests may be submitted via the contact details stated in Article 1 of this privacy statement. Second Owner will respond within one month of receipt. If the complexity of the request so requires, this period may be extended by two months, of which the data subject will be informed in a timely manner.

8.4. Data subjects have the right at all times to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) (www.autoriteitpersoonsgegevens.nl).

Article 9. Amendments to the Privacy Statement

9.1. Second Owner reserves the right to amend this privacy statement. Material changes will be communicated to the counterparty in a timely manner. The most recent version of the privacy statement is always available on the Second Owner website.

Date: May 2026

Article 10. General

10.1. The Second Owner website uses cookies. Cookies are small text files that are placed on the visitor's device (computer, tablet, smartphone) when visiting the website.

10.2. Second Owner places and uses cookies solely in a manner that complies with the Dutch Telecommunications Act and the GDPR, including statutory rules regarding consent, information obligations, and the protection of personal data.

Article 11. Categories of Cookies

11.1. Second Owner distinguishes between the following categories of cookies:

a. Functional (necessary) cookies

These cookies are strictly necessary for the proper functioning of the website and for providing the service requested by the visitor. Without these cookies, the website cannot function properly. No prior consent is required for these cookies pursuant to Article 11.7a(3)(b) of the Dutch Telecommunications Act.

b. Analytical cookies

These cookies are used to collect information about the use of the website in order to improve its quality and effectiveness. Insofar as these cookies have no or only limited impact on the privacy of the visitor, they are placed under the exemption of Article 11.7a(3)(b) of the Dutch Telecommunications Act. If analytical cookies do affect privacy, prior consent will be requested.

c. Marketing cookies (tracking cookies)

These cookies are placed exclusively after explicit prior consent of the visitor, given by means of an active action. These cookies enable Second Owner and/or third parties to track browsing behaviour for personalised marketing purposes. The processing of personal data via these cookies is based on Article 6(1)(a) GDPR.

11.2. Second Owner is not responsible for the privacy policies or cookie use of third-party websites to which reference is made on the Second Owner website.

Article 12. Use of Leadinfo

12.1. Second Owner uses the lead generation service of Leadinfo B.V., based in Rotterdam, the Netherlands. This tool identifies business visits to the Second Owner website based on IP addresses and displays publicly available information, such as company names or addresses. Leadinfo places two first-party cookies to evaluate user behaviour on the website and processes domains from form inputs to correlate IP

addresses with companies and improve services. More information about Leadinfo is available at www.leadinfo.com. An opt-out can be set via <https://www.leadinfo.com/en/opt-out>. After opting out, the data of the data subject will no longer be registered by Leadinfo.

Article 13. Consent

13.1. Upon the first visit to the website, the visitor is informed via a cookie banner about the use of cookies and is requested to provide consent for the placement of non-essential cookies. Refusing consent is as easy as granting it. Cookies requiring consent are not placed before the visitor has given such consent through an active action.

13.2. Refusal to consent to non-essential cookies has no consequences for access to the website or the services of Second Owner, except insofar as certain functionalities are technically dependent on specific cookies.

Article 14. Managing Cookie Preferences

14.1. The visitor may change their cookie preferences or withdraw previously given consent at any time via the cookie banner or the cookie settings on the Second Owner website. Additionally, cookies may be deleted or blocked via browser settings. Second Owner notes that blocking or deleting cookies may affect the functionality of the website.

Article 15. Amendments

15.1. Second Owner reserves the right to amend this cookie policy. Material changes will be communicated in a timely manner via the website. The most recent version of the cookie policy is always available on the Second Owner website.