

Privacy Policy (B2B)

Last Updated: 12 march 2025

Binding Language: The English version of this policy is legally binding.

1. Introduction

WorldWatch.Market (“WWM,” “we,” “us,” or “our”) operates a B2B marketplace for professional watch dealers. While we focus on business data, we recognize that GDPR applies to any data that identifies a natural person (e.g., a contact person at a dealership). This Privacy Policy outlines how we collect, use, and protect personal data under the General Data Protection Regulation (EU) 2016/679 (GDPR) and other applicable laws.

- **Data Controller:** Dunefields B.V., established in The Netherlands.
- **Contact:** sales@worldwatch.market

By registering for or using our Platform (the “Platform”), you confirm you have read and understood this policy.

2. Scope & The Nature of Our B2B Platform

1. Business vs. Personal Data

- We primarily handle “business contact data” (e.g., a work email or phone of a dealership contact). However, if it identifies or can be linked to an individual, it constitutes personal data under GDPR.
- Even in a B2B context, we safeguard such data in accordance with EU data protection rules.

2. Platform Function

- WWM is an online catalog or listing service where professional watch dealers showcase their inventory. We do not process final transactions or handle consumer deals.
- Any data that might reference watch owners (third parties) is not processed by WWM for our own purposes; we act as an independent controller only for the data that dealers directly provide about themselves, not as a joint controller for personal data about end-customers.

3. Data We Collect & Purposes

We collect and process the following categories of personal data:

A. Account & Verification Data

- **Examples:** Business name, VAT number, Chamber of Commerce extract, professional email, professional phone, KYC documents (where required).
- **Purpose:**
 - Account creation & authentication
 - Sanctions/AML checks (if applicable)
- **Legal Basis:**
 - Article 6(1)(b) GDPR (performance of a contract)
 - Article 6(1)(c) GDPR (compliance with legal obligations, e.g., anti-fraud, DAC7)

Retention:

- KYC/AML data may be stored for up to 5 years (or longer if legally required).
- General account data is kept for the duration of your account and up to 12 months after termination for legal/administrative purposes.

B. Listing & Dealer Profile Data

- **Examples:** Dealer logo, brand references, images of watches, user-generated descriptions.
- **Purpose:** Showcasing your offerings on our B2B marketplace, facilitating connections with other professional dealers or service partners.
- **Legal Basis:**
 - Article 6(1)(b) GDPR (necessary for contract)
 - Article 6(1)(f) GDPR (our legitimate interest in presenting your listings)

Retention:

- Archived listings may be kept indefinitely for analytics or historical reference. However, we will minimize personal details over time (e.g., anonymize or restrict access) to comply with Article 5(1)(c) GDPR.

C. Communications & Support

- **Examples:** Emails, chat logs, or support tickets.
- **Purpose:** Handling inquiries, providing technical or dispute support, maintaining service quality.
- **Legal Basis:**
 - Article 6(1)(b) GDPR (contractual)
 - Article 6(1)(f) GDPR (legitimate interest in customer service)

Retention:

- Typically stored for 12 months after the issue is closed, then deleted or anonymized unless required for legal or compliance reasons.

D. Analytics & Market Insights

- **Examples:** IP addresses, device info, usage logs, multi-channel sales data (if provided), aggregated statistics.
- **Purpose:**
 - Improving platform performance
 - Generating market insights, which we may sell or share in an aggregated, anonymized format.
- **Legal Basis:**
 - Article 6(1)(f) GDPR (our legitimate interest in analyzing usage and industry trends).
 - We have conducted a legitimate interests assessment (LIA) to ensure no undue impact on data subjects' rights.

Retention:

- Analytics data is typically stored in aggregated form, making re-identification difficult. Where logs include personal identifiers, we delete or anonymize them after 24 months.

E. Marketing Communications

- **Examples:** Your professional email, subscription status, lead generation data.
- **Purpose:** Sending B2B news, updates, or special offers about WWM's services.
- **Legal Basis:**
 - Article 6(1)(f) GDPR (legitimate interests for B2B marketing) or consent where local law requires.
- **Opt-out:** We include an unsubscribe link in every marketing email. If you unsubscribe, we retain minimal data to ensure we respect your preferences.

4. Your Rights Under GDPR

Where the GDPR applies, you have:

- **Right of Access** (Art. 15): Obtain confirmation of whether we process your data and request a copy.
- **Right to Rectification** (Art. 16): Correct inaccurate or incomplete data.
- **Right to Erasure** (Art. 17): Ask us to delete your data (subject to legal retention obligations).
- **Right to Restriction** (Art. 18): In certain circumstances, limit our processing.
- **Right to Object** (Art. 21): Object to processing based on legitimate interests, including direct marketing.
- **Right to Data Portability** (Art. 20): For data processed under contract or consent, request a structured, machine-readable export.

Exercising your Rights:

- Email sales@worldwatch.market with "GDPR Request" in the subject.
- We may ask for proof of identity (e.g., a Chamber of Commerce extract showing your name) to prevent unauthorized requests.

- We aim to respond within 1 month in accordance with Article 12(3) GDPR.

If you believe we violate data protection rules, you can also lodge a complaint with your local data protection authority or the Dutch Autoriteit Persoonsgegevens.

5. Data Sharing & International Transfers

1. Third-Party Processors:

- We share limited personal data with service providers (hosting, analytics, or shipping/insurance partners) under Data Processing Agreements, ensuring GDPR compliance.

2. Cross-Border Transfers:

- If data is transferred outside the EEA, we rely on Standard Contractual Clauses (Commission Implementing Decision (EU) 2021/914) and perform Transfer Impact Assessments (TIAs), aligning with the Schrems II ruling.

3. No Joint Controller:

- If dealers upload personal data about third parties (e.g., watch owners), we do not become a joint controller for that data. We only process the limited data you provide about your B2B operations.

6. Cookies & ePrivacy Considerations

1. Cookies Used:

- Functional/essential cookies to maintain site navigation and account logins.
- Analytical cookies (e.g., Google Analytics) for usage statistics. We may require an opt-in or allow an opt-out depending on local ePrivacy laws.

2. Consent Mechanism:

- A cookie banner or preference center may appear on first visit to allow you to refuse non-essential cookies.

7. Marketing & Communication

1. B2B Marketing:

- We rely on legitimate interests (Art. 6(1)(f) GDPR) or local “soft opt-in” rules to send communications to professional leads. Where required, we obtain consent.

2. Records of Unsubscribes:

- We maintain records of unsubscribes to ensure compliance with spam and ePrivacy rules.

3. Consent for New Leads:

- If you sign up or explicitly request info, we treat that as consent for contact. You can withdraw consent at any time.

8. Selling Aggregated Market Data

1. **Aggregated & Anonymized:**
 - We may produce market insights based on watch listings, channel usage, or transaction logs. When we sell or share these insights, we ensure they're aggregated or pseudonymized so no individual is identifiable.
2. **No Sale of Individual Profiles:**
 - We do not sell your personal data on a one-to-one basis. If exceptionally we need to share non-aggregated data, we will rely on a lawful basis (e.g., contractual necessity or your explicit consent) and ensure data subjects' rights are protected.

9. Security Measures

- **Encryption in Transit:** We use TLS (Transport Layer Security) to protect data transmitted between your browser and our servers.
- **Access Controls:** Only authorized staff can access personal data, subject to role-based permissions and NDA obligations.
- We continuously review and update security measures in line with industry standards.

10. Retention Periods (Recap)

- **Account Data:** Stored until your account is deactivated + 12 months for administrative or legal purposes.
- **KYC/AML Docs:** Retained up to 5 years (or longer if required by financial regulations).
- **Listings & Archive:** Indefinite archival for analytics/history, but personal identifiers are minimized or anonymized after 24 months.
- **Chat/Support Logs:** Typically retained for 12 months post-closure, then deleted or anonymized unless needed for legal reasons.

11. Updates to This Policy

We may amend this Privacy Policy periodically. Material changes will be communicated (e.g., via email or Platform notice). Continued use after such updates indicates acceptance of the revised terms.

12. Contact & Further Information

If you have questions, concerns, or wish to exercise any GDPR rights:

- **Email:** sales@worldwatch.market
- **Address:** Damsterdiep 10, 9711SK, Groningen
- **Supervisory Authority:** You may lodge a complaint with the Dutch Autoriteit Persoonsgegevens or your local data protection authority.

Final Note

This Privacy Policy reflects our commitment to protect personal data in a B2B environment while recognizing the GDPR's broad definition of "personal data." We have conducted legitimate interest assessments for relevant processing operations, and we remain open to any questions you may have regarding our data practices. If you need more details, please contact us at sales@worldwatch.market.