

Privacy Policy

PM Online/ PB Online

Effective date: January 1, 2026

1. Who we are

This Privacy Policy explains how Streamline Solutions B.V. ("Streamline") collects and uses personal data when you visit our website, request information, or use PM Online/ PB Online (the "Service").

Our details:

- Legal entity: Streamline Solutions B.V.
- Address: Grebbelinieweg 24, Curaçao
- Registration / Chamber of Commerce number: 168892 (0)
- VAT / Tax ID: 102719329
- Privacy contact email: office@performancemanagement-online.com

2. Scope

This Privacy Policy applies to personal data processed in connection with the Service and our website (including demo requests and support).

If you are an employee, contractor, or other end user whose data is entered into the Service by your employer or another organization, that organization typically determines the purposes and means of processing. In that case, your employer or organization is your primary point of contact for HR-related processing questions.

3. Roles: Controller and Processor

In most cases, business customers use the Service to manage internal performance management processes. In that situation:

- The customer is the data controller (it decides what data is entered and why).
- We act as a data processor when we process personal data on the customer's behalf to provide the Service.

When we process personal data for our own purposes (for example, billing, account administration, website security, and marketing), we act as a data controller.

Where required, our processing as a processor is governed by a separate Data Processing Addendum (DPA). Our DPA is available on request.

4. Personal data we process

Depending on your relationship with us and how the Service is used, we may process the following categories of personal data:

- Identification and contact data (name, email address, phone number, job title, employer).
- Account and authentication data (username, password hash, role/permissions, MFA status).
- Service content and HR-related data entered by customers (for example, goals, reviews, feedback, competencies, training records, and related notes).
- Technical data (IP address, device/browser information, log data, timestamps).
- Billing and transaction data (invoices, payment status, company contact persons).
- Support communications (tickets, emails, call notes).
- Marketing preferences and engagement data (newsletter opt-in/out, event registrations).

The Service is not intended to process special categories of personal data (such as health data) unless the customer chooses to enter such data and has a lawful basis to do so.

5. How we collect personal data

- Directly from you (for example, when you create an account, request a demo, or contact support).
- From our customers (for example, when an organization creates end-user accounts and enters HR/performance content).
- Automatically through your use of the Service and website (for example, logs and cookies).
- From third parties that support the Service (for example, hosting, email delivery, analytics, API-partners), where applicable.

6. Purposes and lawful bases

We process personal data only where we have a lawful basis to do so. Depending on the context, this may include:

- Contract necessity (to provide the Service and manage the customer relationship).
- Legitimate interests (for example, securing and improving the Service, preventing fraud, basic analytics).
- Consent (for example, certain marketing communications and non-essential cookies, where required).
- Legal obligation (for example, accounting and compliance requirements).

Streamline Solutions B.V. is established in Curaçao and processes personal data in accordance with applicable data protection and privacy laws.

Personal data and HR/performance content submitted by customers to the Service are processed on their behalf solely to provide and support the contracted Service, in accordance

with their documented instructions and the applicable DPA. We do not use this content for our own marketing or other independent purposes.

Our processing for our own purposes, as described above, concerns separate website, business contact, billing and administrative data.

7. Sharing and sub-processors

We may share personal data with the following categories of recipients, to the extent necessary:

- Hosting and infrastructure providers (cloud hosting, backups).
- Email and communication providers (transactional emails, support communications).
- Analytics and monitoring providers (to maintain performance and security).
- Payment and invoicing providers (to process payments, issue invoices, and manage billing), where applicable.
- Professional advisers (legal, tax, auditors) where needed.
- Authorities or regulators where we are legally required to do so.
- A buyer/successor in a merger, acquisition, or asset sale (subject to appropriate safeguards).

A current list of sub-processors is available on request.

8. International data transfers

All primary client data is hosted within the European Union. Streamline Solutions B.V. is established in Curaçao. EU hosting does not exclude access to or processing of personal data by authorized personnel in Curaçao for the provision and support of the Service.

Where personal data is transferred from the EU/EEA to Curaçao or another country outside the EU/EEA, we apply appropriate safeguards, such as Standard Contractual Clauses, where

9. Data retention

We retain personal data only for as long as necessary for the relevant purpose.

The following standard retention periods apply, unless a different period is required by applicable law or expressly agreed in writing with the customer:

- Active client data: retained for the duration of account activation.
- Terminated client data: retained for 90 days after contract termination, followed by secure deletion.
- Database backups: retained on a rolling 45-day basis, with older backups automatically overwritten.
- Application audit logs: retained for 24 months.
- Support communications by email: retained for 12 months.
- Anonymized usage analytics: retained for the duration of account activation.
- Billing records: retained for the period required by applicable accounting and tax laws.

Residual copies of deleted client data in database backups are removed through the rolling backup cycle. Where applicable law requires specific records to be retained longer, retention is limited to those records and the required period.

10. Security

We implement appropriate technical and organizational measures designed to protect personal data against unauthorized access, loss, misuse, alteration, or destruction.

These measures include TLS 1.2 or higher for data in transit, role-based access controls, multi-factor authentication (MFA) enforced for all company accounts, secure password hashing, server-side encryption for stored documents and database backups, and daily database backups.

Access to production systems and live client data is restricted to authorized internal administrators. Development personnel work exclusively in a separate non-production environment and do not have access to live client data.

11. Cookies and similar technologies

We use cookies and similar technologies on our website and, where applicable, within the Service to enable functionality, improve performance, and understand usage. Cookie categories may include strictly necessary, functional, analytics, and marketing cookies.

Cookie banner / preference center (if applicable): You can manage cookies through your browser settings. Where a cookie banner is presented, you can adjust your preferences there.

12. Your rights

Depending on your location and the applicable laws, you may have rights such as access, rectification, deletion, restriction, objection, and data portability. You may also have the right to withdraw consent where processing is based on consent.

To exercise your rights, contact us at office@performancemanagement-online.com. We may need to verify your identity before fulfilling a request.

13. Complaints

If you have concerns about our processing of personal data, please contact us first. You may also have the right to lodge a complaint with your local supervisory authority.

14. Automated decision-making

The Service does not use automated decision-making that produces legal or similarly significant effects about individuals.

15. Children

The Service is intended for business use and is not directed to children. We do not knowingly collect personal data from children.

16. Changes to this Privacy Policy

We may update this Privacy Policy from time to time by posting an updated version on our website. The "Effective date" at the top indicates when it was last updated.

17. Contact

Questions about this Privacy Policy can be sent to office@performancemanagement-online.com