



SHIRT CIRCLE

C2C marketplace for match-worn, signed and collectible football shirts

PRIVACY POLICY

Processing of personal data on the Shirt Circle platform (GDPR)

Controller	Shirt Circle VOF
Chamber of Commerce no.	42075122
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Article 1. Controller

- 1.1 Shirt Circle VOF (hereinafter: Shirt Circle, we or us) is the controller for the processing of personal data via the Shirt Circle platform, accessible via shirtcircle.eu and the associated applications.
- 1.2 Shirt Circle is registered in the Commercial Register of the Dutch Chamber of Commerce (KvK) under number 42075122, with its registered office at Havenstraat 305, 1271 GD Huizen, the Netherlands, and can be reached via info@shirtcircle.eu.
- 1.3 Following the intended conversion into a private limited company (besloten vennootschap, B.V.), the legal successor will act as controller, under updated registration details.
- 1.4 This privacy policy forms part of the Terms and Conditions of Shirt Circle and describes which personal data we process, for which purpose, on which legal basis, and which rights data subjects have.

Article 2. To whom this policy applies

- 2.1 This policy applies to all visitors of the Platform, to Users who create an account, and in particular to Buyers and Sellers who conclude transactions via the Platform.
- 2.2 As a rule, we do not process personal data of persons under the age of 18; see Article 15.

Article 3. Which personal data we process

- 3.1 Depending on the use of the Platform, we process the following categories of personal data:
 - a) **Account and profile data:** name, username (handle), e-mail address, password (stored in encrypted form), and profile information added by the User.
 - b) **Address and shipping data:** name, address, postal code, city, country and telephone number for the purposes of shipping and delivery.
 - c) **Transaction data:** placed listings, bids, purchases, prices, the Buyer's Premium, order status and invoicing data.
 - d) **Payment and identification data:** data required for payout and identity verification via the Payment Service Provider (including, for Sellers, data for the Stripe Connect verification). Full bank account and card details are processed by the Payment Service Provider and are not stored by Shirt Circle.
 - e) **Communication and dispute data:** messages between Users, correspondence with Shirt Circle, and evidence submitted in the context of disputes (such as photographs and videos).
 - f) **Tax and reporting data:** for Sellers, the data we are required to collect and report under DAC7, including the tax identification number (see Article 7).
 - g) **Technical and usage data:** IP address, device and browser data, log data and data collected through cookies and similar technologies (see Article 10).
- 3.2 As a rule, we do not collect special categories of personal data. If a User includes such data in a message or piece of evidence, we advise against doing so.

Article 4. Purposes and legal bases

- 4.1 We process personal data exclusively for the purposes listed below and on the legal basis under Article 6 GDPR stated for each purpose (and, where indicated, Article 9 GDPR).

Purpose of the processing	Legal basis (GDPR)	Retention period
Creating and managing the account and access to the Platform	Performance of a contract (Art. 6(1)(b))	Up to 24 months after termination of the account
Concluding and settling transactions, payment, payout and shipping	Performance of a contract (point (b))	See statutory tax retention obligation below
Maintaining tax and financial records and invoicing	Legal obligation (point (c))	7 years (Art. 52 Dutch General Tax Act (AWR))
Reporting of seller data to the Dutch Tax Administration under DAC7 (incl. tax identification number)	Legal obligation (Art. 6(1)(c) in conjunction with Art. 9(2)(g))	Statutorily prescribed period
Handling of reports, disputes, INR/SNAD and the management of held funds	Performance of a contract (point (b)) and legitimate interest (point (f))	Up to 2 years after completion
Fraud prevention, security and enforcement of the Terms and the DSA	Legitimate interest (point (f)) and legal obligation (point (c))	Up to 2 years, longer where necessary
Customer service and communication	Performance of a contract (point (b)) and legitimate interest (point (f))	Up to 2 years after last contact
Improving and securing the Platform and analytics	Legitimate interest (point (f))	Up to 14 months (aggregated data longer)
Sending newsletters and marketing	Consent (point (a)) or legitimate interest in the case of existing customers (point (f))	Until consent is withdrawn or objection is made

4.2 Where processing is based on consent, that consent may be withdrawn at any time, without affecting the lawfulness of the processing carried out prior to the withdrawal.

Article 5. Recipients and processors

5.1 We provide personal data to third parties only insofar as necessary for the purposes listed above. We conclude data processing agreements with processors. The main recipients are:

Recipient	Role	Purpose
Stripe Payments Europe, Ltd.	Payment service provider / processor	Payment processing, holding of held funds, payout to Sellers and identity verification (KYC)
Sendcloud B.V.	Processor	Creation of shipping labels, shipping and track-and-trace
XCover / Cover Genius	Insurer / recipient	Settlement of shipping insurance and insurance claims (Sendcloud Shipment Protection)
Supabase	Processor (hosting)	Hosting of database, authentication and file storage
Vercel	Processor (hosting)	Hosting and delivery of the web application
Dutch Tax Administration and competent authorities	Recipient	Statutory reporting (DAC7) and compliance with lawful requests and orders
Professional advisers (accountant, lawyer)	Recipient / processor	Insofar as necessary for advice, compliance and dispute resolution
PostHog, Inc. (EU Cloud)	Processor (analytics)	Privacy-friendly analytics to understand Platform usage, improve functionality and measure performance.

- 5.2** Messages and profile data posted on the Platform are visible to other Users insofar as necessary for the use of the Platform (for example, the public seller name and listings). A User's home address is not a public profile detail.

Article 6. Transfers outside the European Economic Area

- 6.1** Some of the service providers referred to in Article 5 may process personal data outside the European Economic Area (EEA), including in the United States.
- 6.2** Insofar as a transfer to a country outside the EEA takes place, we base that transfer on an appropriate safeguard mechanism within the meaning of Chapter V GDPR, such as an adequacy decision of the European Commission or the Standard Contractual Clauses, supplemented by appropriate additional measures.

Article 7. Statutory reporting obligation (DAC7)

- 7.1** Pursuant to Directive (EU) 2021/514 (DAC7) and the Dutch implementing legislation, Shirt Circle, as a platform operator, is obliged to collect and verify certain data of reportable Sellers and to report such data annually to the Dutch Tax Administration.
- 7.2** These data may include: name, address, date of birth (for natural persons), tax identification number, VAT number where applicable, bank account details, and the total consideration received via the Platform per quarter.
- 7.3** Sellers are obliged to provide the data requested for this purpose. If a Seller fails to do so, Shirt Circle may suspend payouts or restrict the account, in accordance with applicable regulations.
- 7.4** The processing of the tax identification number (including, where applicable, the Dutch citizen service number (BSN)) takes place exclusively in order to comply with this statutory obligation, on the basis of **Article 6(1)(c) in conjunction with Article 9(2)(g) GDPR**. These data are not used for any other purpose.

Article 8. Retention periods

- 8.1** We do not retain personal data longer than necessary for the purposes for which they were collected, or for as long as required by law. The periods are set out in the table in Article 4.
- 8.2** The statutory retention obligation of seven years applies to tax and financial records. Data required for ongoing or reasonably foreseeable disputes or for compliance with legal obligations may be retained for that period.
- 8.3** After expiry of the applicable period, personal data are deleted or irreversibly anonymised.

Article 9. Security

- 9.1** We take appropriate technical and organisational measures to protect personal data against loss and unlawful processing. These include encryption of passwords, encrypted connections, row-level access restriction in the database (row-level security), separated access to private data such as addresses, and restricting access to authorised persons.
- 9.2** Full bank account and card details are processed exclusively by the Payment Service Provider and are not stored by Shirt Circle.

Article 10. Cookies and similar technologies

- 10.1** The Platform uses cookies and similar technologies. Functional and strictly necessary cookies (for example, for logging in and security) are placed without consent, because they are necessary for the operation of the Platform.
- 10.2** For analytics cookies that have a more than limited impact on privacy and for marketing cookies, we ask for prior consent. Consent can be changed or withdrawn at any time via the cookie settings.
- 10.3** A detailed overview of the cookies used, their purpose and retention period will be included in a separate cookie statement.

Article 11. Automated decision-making

- 11.1** We do not take decisions with legal effect or similarly significant effect that are based solely on automated processing. Disputes are assessed by a person (the reviewer) on the basis of a fixed assessment framework, as described in the Marketplace Protection Policy.
- 11.2** Automated signals may be used to support fraud prevention, but as a rule do not lead to blocking without human review.

Article 12. Rights of data subjects

- 12.1** Under the GDPR, you have the following rights with regard to your personal data:
- a) the right of access to the personal data we process;
 - b) the right to rectification of inaccurate or incomplete data;
 - c) the right to erasure (right to be forgotten), insofar as no statutory retention obligation or other compelling interest precludes this;
 - d) the right to restriction of processing;
 - e) the right to data portability;
 - f) the right to object to processing based on legitimate interest, and to direct marketing;
 - g) the right to withdraw consent that has been given.
- 12.2** You can submit a request to exercise these rights via info@shirtcircle.eu. As a rule, we respond within one month. We may ask for additional information to verify your identity.

Article 13. Personal data breaches

- 13.1** In the event of a personal data breach, we act in accordance with the GDPR. Where required by law, we report the breach within 72 hours to the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) and, where applicable, to the data subjects concerned.

Article 14. Complaints and supervisory authority

- 14.1** If you have a complaint about the processing of your personal data, you can contact us via info@shirtcircle.eu.
- 14.2** You also have the right to lodge a complaint with the Dutch Data Protection Authority (autoriteitpersoonsgegevens.nl) or with the supervisory authority in your country of residence.

Article 15. Minors

- 15.1** The Platform is intended exclusively for persons aged 18 or over. We do not knowingly collect personal data of persons under the age of 18. If we establish that such data have been collected, we delete them.

Article 16. Amendments

- 16.1** We may amend this privacy policy. The current version is published on the Platform, with a version and date indication. In the event of material amendments, we inform Users in an appropriate manner.

Article 17. Contact

- 17.1** For questions about this privacy policy or the processing of your personal data, you can contact Shirt Circle via info@shirtcircle.eu.

— *End of Privacy Policy* —