

Global-e Privacy Policy

This **Privacy and Cookies Policy** (“**Policy**”) governs how we, Global-e or any of our affiliated companies (Global U.K. Ltd., Global-e US Inc, Global-e NL B.V., Global-e France SAS, Global-e Spain S.L., Global-e Canada E-commerce Ltd., in each case) (together with our respective affiliates and subsidiaries, “**Global-e**”, “**we**”, “**our**” or “**us**”), collect, receive, use, store and disclose Information (defined below) about individuals in connection with the use of our online order processing and fulfilment services for the sale of products to you (“**Service**”).

We make great efforts ascertaining that we secure your Information and use it properly.

This policy explains our privacy practices for processing Information regarding our Services. We will collect, use or disclose your Information only in accordance with the terms of this policy.

For Canadian residents: Please note that the personal information we collect from you may be transferred to the UK, Europe and the United States. By agreeing to this Policy, you consent to your personal information being transferred and collected, used, and disclosed in accordance with this Policy.

The below summary of this Policy will give you an overview of our practices. Please also take the time to read our full Policy for further detail in each area.

If you do not wish us to collect your information, please do not submit it to us. However, please bear in mind that we will not be able to process your order without receiving your details.

Global-e may change and update the terms of this Policy from time to time. If we decide to change our Privacy Policy materially, we will post the revised Policy here with an updated effective date and we will inform you of such changes by any appropriate means.

Summary of Global-e Privacy Policy

The Information You Provide Us and We Collect

If you use the Service, we will need your Information (such as your name, email address and physical address) to process the transaction and deliver the purchased products. We will need your payment details to process your payment. We will also receive any Information that you provide us when you contact our customer support.

We automatically log 'traffic/session' information including IP addresses and your user agent. We also collect session durations and additional activity information.

Cookies - We use cookies to make it easier for you to log-in and to facilitate Service activities. We use standard analytics tools. The privacy practices of these tools are subject to their own privacy policies and cookies.

What Do We Do with Your Information? – We use your Information for performing the contract with you and for our related legitimate interests. We maintain the Service, make it better, and continue developing it, and protect us and the Service from misuse and law violations.

Sharing Information with Others – We will share Information that we collect with the specific Retailer who owns or operates the website from which you made your purchase. We will provide the Retailer with your Information for Retailer’s marketing purposes, if you provided your specific consent.

If you do not agree with the disclosure of your personal information to a third-party retailer, you will not be able to use the Service. By agreeing to this Policy, you agree to the disclosure of your personal information to third-party retailers. You will also need to read and understand the privacy policies of those retailers.

We will share your Information with service providers and other third parties, if necessary, to fulfil the purposes for collecting the Information, provided that any such third party will commit to protect your privacy as required under applicable law and this Policy.

EU-US Privacy Shield – We are self-certified to the EU-US Privacy Shield Framework, in connection with processing Information from EU member states.

Sharing Information in case of a Structural Change - a merger, acquisition or any other structural change will require us to transfer your Information to other entities, provided that the receiving entities will comply with similarly protective policy in accordance with applicable law.

Anonymous, Aggregated and Analytical Information – We may take steps to de-identify and make anonymous some of your personal information so that it no longer can be used to directly or indirectly identify you (we will do this in a way that will also prevent this data from ever being re-identified). We may use Anonymous Data in a number of ways to improve our Services or share it with third parties. In those case, we will do so without notice to you.

Your Choice – You may terminate your use of the Service. Our Service does not respond to Do Not Track (DNT) signals.

Specific Provisions for California Residents and Consumers Privacy Rights – If you are a California resident, further terms apply to our processing in relation to your rights as a consumer under the CCPA.

Other Sites and Services - The Service contains links to third party websites and services that are subject to their own privacy policies. Please read these policies and make sure you understand them.

Children’s Privacy - We do not intend to collect Information from anyone we know to be under 16 years (for Canadian residents – 18). If you believe that we have collected such information, please contact us.

Security and Data Retention – We implement systems, applications and procedures to secure your Information, to minimize the risks of theft, damage, loss of Information, or unauthorized access or use of Information. We retain data as needed, to provide the Service and for legitimate and lawful purposes.

Accessing and Correcting Your Information - At any time you can request access to your Information by contacting us. You may also request that your information be corrected should it be inaccurate.

Your EU Data Subject Rights – If we process your Information when you are in the EU, further terms apply to our processing in relation to your rights as a data subject under EU data protection laws.

Dispute Resolution – Contact us at: dataprotection@global-e.com or write us for specific requests or complaints. We will make good-faith efforts to resolve any existing or potential dispute with you.

Additional Information for Residents of Other Countries - If you are a resident of Australia or Hong Kong, we have some clarifications and further information for you in relation to the applicable local law.

Changes to this Privacy and Cookies Policy – We will update this Policy from time to time and post any material changes we make. If you continue to use the Service after these changes are posted, you agree to the revised Policy

Incorporation to the Terms of Use - This Policy forms part of the terms and conditions of our Service.

Contact Us - please contact us at: dataprotection@global-e.com for further information.

1. How We Collect Your Information

We receive and collect Information from you in the following ways:

- 1.1. **Purchases.** The Service enables you to purchase online merchandise from retailers in certain countries that do not normally provide order processing and fulfilment services (“Retailers”).

If you choose to make a purchase, payment or place an order via the Service we will require sufficient information, including Information, from or about you in order to process and complete the transaction, as well as to provide subsequent notification and support services.

This information will be provided by you to us directly or in certain cases (where you are pre-registered with the Retailer) specific information will be provided by the Retailer to pre-populate transaction forms for ease of completion by you.

- 1.2. **Transaction.** We collect information about the item(s) purchased and about you - the purchaser, in particular: first name, last name, email, phone number and postal address and payment information including the payment method and payment details (with expiration dates) and any payment voucher details that you provide us.
- 1.3. **Delivery.** We collect information about the preferred shipping and delivery details relevant to the specific transaction and contact details to send notification of the placement shipping and fulfilment of the order.
- 1.4. **Enquiries.** When you contact us, or when we contact you, we will receive and process any Information that you provide us.
- 1.5. **Log Files.** We use log files that we collect automatically from your computer or device when you interact with the Service. The information contained in log files includes internet protocol (IP) (the unique address that

identifies your computer or device on the internet), type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser sends to us.

Such information will be used for legitimate interests such as analyzing trends, administering the Service, authentication for security purposes of a user's movement around the Service, and gather broad demographic information relating to how purchasers interact with the Service.

"**Information**" means any information relating to an identified or identifiable individual including a first and last name an email address, a home or other physical address, or other contact information. It also includes indirect identifiers such as credit card information or online identifiers.

2. Cookies

We use cookies and similar tracking technologies to make sure that our Service is continuously improved and meets your needs.

Please view our [Cookies Policy](#) for more information on our use of cookies.

3. What Do We Do with the Information?

Your Information will be used in the following ways:

- 3.1. Performance of our contract with you. We will use your Information to provide you with the Service under the Service Terms and Conditions.
- 3.2. Legitimate business interests. We will use your Information to improve our Service, to prevent or detect fraud or abuse, to personalize your user experience, to contact you in connection with the Service and any transactions that you have initiated or completed, and to identify and authenticate your access to the parts of the Service that you are authorized to access.

Where your Information is needed to fulfil the Service under the Service Terms and Conditions, a failure to provide that information will prevent us from completing the transaction and we will refer you back to the specific Retailer.

- 3.3. Responding to Your Enquiries. We will use your designated email address and contact information for the legitimate purpose of responding to a "Contact Us" or administrative requests submitted by you.

4. Sharing Your Information with Others.

- 4.1. Transferring Information to Retailers. In connection with using our Service to make purchases we will share the Information that we collect from you (but except for payment data such as credit card number details) with the specific Retailer who owns or operates the website from which you made your purchase.

Such Retailer will then be entitled to use your Information as if that Retailer has collected this information directly, subject to the Retailer's own privacy policy.

For instance, the Retailer needs to know that you have made a purchase in order to process delivery of your purchase, to handle any requests by you to return or replace a product and it needs to know if you are already a subscriber or member of its services so that you can take advantage of any loyalty scheme that it administers.

If you do not agree with the disclosure of your personal information to a third-party retailer, you will not be able to use the Service.

- 4.2. Marketing. While we do not use your Information for our own marketing purposes, we will disclose your Information for marketing purposes to the specific Retailer who owns or operates the website from which you made your purchase where you have provided your specific consent via our Service to receive its marketing materials by either email, telephone, text message or post.

In order to understand how the Retailer uses your Information you should read, understand and agree to its privacy notice and policies; we neither control nor are responsible for the policies of these retailers.

We do not ask, or receive, any valuable consideration in exchange of the share of your personal information.

- 4.3. Using Affiliates to Store/Process Data. We will share your Information with our subsidiaries (including, but not limited to, Global-e Australia Pty. Ltd. if purchases are made from Australia) or affiliated companies for storing or processing such information on our behalf in connection with our provision of the Services. Such information

will be transferred to other countries around the world where our or their servers and systems are located. Where you use our Services from Europe to make purchases, your data is stored on servers within the European Economic Area (EEA). We require that these parties agree to process such information in compliance with Global-e policies and procedures.

If we transfer Information outside the European Economic Area (EEA) we will comply with applicable laws relating to data transfers outside the EEA. It is important to note, however, that our website and Services are operated via servers situated in the EU.

Global-e accepts full responsibility for the protection of your Information, according to the applicable privacy legislation, the EU-U.S. Privacy Shield and this Policy, during these onward transfers to third parties.

- 4.4. Using Third Party Service Providers. We will share (in so far as such sharing is necessary) your Information with our third-party service providers (such as hosting providers, payment processors, anti-fraud service providers, licensed customs brokers, and order fulfilment providers) whose tools, software, and services we use to process and complete your transaction(s).

We use commercially reasonable efforts to ensure that such third-party service providers will only process your Information as part of providing the Service. Such third-party service providers are located in countries outside the EEA and if there is a transfer of Information outside the EEA we will comply with the applicable laws relating to data transfers outside the EEA.

- 4.5. Necessary Disclosure. We will disclose your Information or any information you submitted via the Services if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to:
- a) comply with any applicable law, regulation, legal process or governmental request;
 - b) enforce the Terms and Conditions, including investigations of potential violations thereof;
 - c) detect, prevent, or otherwise address fraud or security issues; or,
 - d) protect against harm to the rights, property or safety of Global-e, its users, yourself or the public.

5. **Sharing Information in case of a Structural Change.**

We will disclose or transfer your Information if we are acquired by or merged with a third- party entity, or if we are bankrupted or liquidated. If we will use your Information or disclose for any purposes not covered in this Policy in this regard, then we will make efforts to ensure that you receive prior notification of the new purpose and where relevant, your consent obtained for those new purposes.

6. **Adherence to the Privacy Shield Frameworks.**

We comply with the EU-US Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use and retention of Information transferred from the European Union to the United States. Global-e has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms of this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern.

To learn more about the Privacy Shield program and to view our certification, please visit <https://www.privacyshield.gov/>

- 6.1. Resolution of Privacy Shield queries and complaint mechanism - In compliance with the Privacy Shield Principles, Global-e commits to resolve complaints about our collection or use of Information transferred pursuant to the Privacy Shield Framework. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact our Privacy officer at: dataprotection@global-e.com.

Global-e has further committed to cooperate with EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning Information transferred from the EU. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact the EU DPAs for more information or to file a complaint. The services of the EU DPAs are provided at no cost.

- 6.2. Privacy Shield enforcement – Global-e is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC) with respect to specific EU Information received or transferred pursuant to the Privacy Shield Frameworks. In certain situations, Global-e will be required to disclose Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

7. Anonymous, Aggregated and Analytical Information.

We may take steps to de-identify and make anonymous your personal information. In doing so we take steps to ensure that this data cannot be re-identified. We may use Anonymous Data in a number of ways to improve our Services or share it with third parties. In those case, we will do so without notice to you. We will also disclose Anonymous Data (with or without compensation) to third parties, including advertisers and partners.

"Anonymous Data" means information which does not enable identification of an individual user so that identification is irreversibly prevented, such as aggregated information about the use of our Service. Therefore, such information does not constitute "personal information" and use and disclosure of same does not affect any of your rights under US, EU, Canadian or other applicable privacy laws.

8. Your Choice.

- 8.1. We request and collect minimal personal details that we need for the purposes described in this Policy. At any time, you may opt to terminate your use of the Service according to the Service Terms and Conditions (see section 8 - Consumer Cancellation Rights).

Thereafter, we will stop collecting any Information from you. However, we will store and continue using or making available certain Information that is related to you. For further information, please read the Security and Data Retention section in this Policy.

- 8.2. Web browsers offer a "Do Not Track" ("DNT") signal. A DNT signal is a HTTP header field indicating your preference for tracking your activities on the Service or through cross-site user tracking. Our Service responds to DNT signals.

9. Specific Provisions for California Residents.

This section applies solely to individuals who reside in the State of California. We adopted this section to comply with the California Consumer Privacy Act of 2018 ('CCPA') and any terms defined in the CCPA have the same meaning when used in this section.

- 9.1. We have collected the following categories of personal information from consumers within the last twelve (12) months:
- a) Identifiers and Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). These include names, telephone number, postal address, online identifier Internet Protocol address.
 - b) Commercial information such as products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
 - c) Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with the Service.
 - d) Geolocation data, such as physical location.
 - e) Inferences drawn from any of the information identified to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.
- 9.2. We obtain the categories of personal information listed above from the following categories of sources:
- a) Directly and indirectly from you and your activity on our Service.
 - b) Third parties such as our retailers.
- 9.3. We use the personal information we collect for one or more of the following business purposes:
- a) To fulfill the reason for which the Information is provided.
 - b) To provide you with our products and services and to further develop and improve our products and services.
 - c) To enforce our terms and as necessary to protect our rights.
 - d) To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.

- 9.4. We disclose personal information to third parties for business purposes as described above under the section titled “**Sharing Your Information with Others**”.
- 9.5. In the preceding twelve (12) months, We have disclosed the following categories of personal information for business purposes:
- a) Identifiers;
 - b) Commercial information
 - c) Internet or other similar network activity
 - d) Geolocation data
 - e) Inferences.

In the preceding twelve (12) months, We have not sold personal information.

10. Your California Rights

If you are a California resident, you may be entitled to the following specific rights under the CCPA regarding your personal information:

10.1. Access to Specific Information and Data Portability Rights

You have the right to request that we will disclose certain information to you about our collection and use of your personal information over the past 12 months. Upon confirmation of your request, We will disclose to you:

- The categories of personal information We collected about you;
- The categories of sources for the personal information We collected about you;
- Our business or commercial purpose for collecting that personal information;
- The categories of third parties with whom we share that personal information;
- The specific pieces of personal information We collected about you;
- If We disclosed your personal information for a business purpose, we will provide you with a list which will identify the personal information categories that each category of recipient obtained.

10.2. Deletion Rights

You have the right to request that we delete any of your personal information. Upon confirmation of your request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

10.3. Exercising Your Rights

- 10.3.1. To exercise the access, data portability, and deletion rights described above, please submit your request to us by sending an email to: dataprotection@global-e.com.
- 10.3.2. Only you or a person authorized to act on your behalf, may make a request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.
- 10.3.3. A request for access can be made by you only twice within a 12-month period.
- 10.3.4. We cannot respond to your request or provide you with the requested personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use the personal information provided in your request to verify your identity or authority to make the request.
- 10.3.5. We will do our best to respond to your request within 45 days of its receipt. If we require more time (up to additional 45 days), we will inform you of the reason and extension period in writing. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

- 10.3.6. Any disclosures we provide will only cover the 12-month period preceding receipt of your request.
- 10.3.7. The response we provide will also explain the reasons we cannot comply with a request, if applicable.
- 10.3.8. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, specifically by electronic mail communication.
- 10.3.9. We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will inform you of the reasons for such decision and provide you with a cost estimate before completing your request.

11. Other Sites and Services.

The Service will contain links to third party websites and services that are not owned or controlled by Global-e including third party payment providers. We are not responsible for the privacy practices or the content of third party websites or services and your use of or connection to such links and websites is at your sole risk. You should review their privacy policies.

12. Children's Privacy.

- 12.1. The Service is not structured to attract or be directed to children under the age of 16 years (for Canadian residents – 18). Accordingly, we do not intend to collect Information from anyone we know to be under 16 years (for Canadian residents – 18).
- 12.2. If we learn that we have collected Information from a child under 16 years (for Canadian residents – 18), we will delete that information quickly. If you believe that we have any such information, please contact us at: dataprotection@global-e.com.

13. Security and data retention.

- 13.1. The security of Information is important to us. We follow generally accepted industry standards, including the use of appropriate administrative, physical and technical safeguards, to protect Information.
- 13.2. For example, certain sensitive Information (such as data relating to fraud) that we receive is processed over a Secure Sockets Layer channel and is encrypted; and our payment gateway is Payment Card Industry compliant. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure.
- 13.3. Therefore, while we strive to use generally accepted means to protect your Information, we cannot guarantee its absolute security or confidentiality. If you have any questions about security on the Service, you can contact us at: dataprotection@global-e.com.
- 13.4. Your Information will be retained by us as necessary to and relevant to our Service Terms and Conditions and our legitimate operations, including time necessary to identify, issue or resolve legal proceedings, enforce our Service Terms and Conditions, to meet our reporting requirements and as otherwise required in accordance with applicable law obligations. Your Information will be retained for the duration of the business/commercial relationship and then in accordance with the applicable statute of limitations – generally 6 years (in the UK).
- 13.5. We will take appropriate steps to delete or permanently de-identify Information at the point this information is no longer needed by us for our legitimate business or legal obligations.

14. Accessing and Correcting Your Information.

- 14.1. At any time, you can contact us at: dataprotection@global-e.com and request to access the Information that we keep about you. We will ask you to provide us certain credentials to make sure that you are who you claim to be and to the extent required under the applicable law, will make good-faith efforts to locate your Information that you request to access. If you find that the information on your account is not accurate, complete or up-to-date, please provide us the necessary information to correct it.
- 14.2. If you are eligible for the right of access under the applicable law, you can obtain confirmation from us of whether we are processing Information about you and receive a copy of that data, so that you could:
 - a) verify its accuracy and the lawfulness of its processing;

- b) request the correction, amendment or deletion of your Information if it is inaccurate or if you believe that the processing of your Information is in violation of the applicable law or the Privacy Shield Principles (please see the EU-US Privacy Shield section in this policy for further information).

14.3. We will use judgement and due care to redact from the data which we will make available to you, Information related to others.

15. Your EU Data Subject Rights.

If EU data protection law applies to the processing of your Information that can directly or indirectly identify you, by Global-e, then the following terms apply:

- 15.1. Access the data that we keep about you. You have the right to obtain (i) confirmation as to whether Information concerning you are processed or not and, if processed, to obtain (ii) access to such Information and a copy thereof. We may need to ask you to provide us certain credentials to make sure that you are who you claim you are.
- 15.2. Rectify the Information that we keep about you. If you find that the data is not accurate, complete or updated, then you may provide us with the necessary information to rectify it.
- 15.3. Delete your Information. In some cases, you have the right to obtain the erasure of personal data concerning you. We may postpone or deny your request if your Information is in current use for providing our Services or to other legitimate purposes such as compliance with regulatory requirements associated with Global-e status as seller and exporter on record.
- 15.4. Restrict the processing of your Information. In some cases, you have the right to obtain restriction of the processing of your Information.
- 15.5. Transfer your Information in accordance with your right to data portability. You have the right to receive the Information concerning you which you have provided to us, in a structured, commonly used and machine-readable format, and you have the right to transmit that Information to another controller without hindrance from us. This right only applies when the processing of your Information is based on your consent or on a contract and such processing is carried out by automated means.
- 15.6. Object to the processing of your Information for direct marketing purposes. You have the right to object, on grounds relating to your particular situation, at any time to processing of Information concerning you when such processing is based on the legitimate interest of Global-e. Global-e may, however, invoke compelling legitimate grounds for continued processing. When your Information is processed for direct marketing purposes (by the Retailers), you have the right to object at any time to the processing of the Information for such purpose.

You have a right to lodge a complaint with a data protection supervisory authority of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR").

A summary and further details about your rights under EU data protection laws, is available on the EU Commission's website at: https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens_en.

Note that when you send us a request to exercise your rights, we will need to reasonably authenticate your identity and location. We will ask you to provide us credentials to make sure that you are who you claim to be and will ask you further questions to understand the nature and scope of your request.

If we need to delete data following your request, it will take time until we completely delete residual copies of the data from our active servers and from our backup systems.

If you have any concerns about the way we process your Information, you are welcome to contact our privacy team at: dataprotection@global-e.com. We will investigate your inquiry and make good-faith efforts to respond promptly.

16. Dispute Resolution.

We do periodical assessments of our data processing and privacy practices, to make sure that we comply with this policy, to update the policy when we believe that we need to, and to verify that we display the policy properly and in an accessible manner. If you have any concerns about the way we process your Information, you are welcome to contact our privacy team at: dataprotection@global-e.com. We will investigate your query and make

good-faith efforts to resolve any existing or potential dispute with you. If you remain unhappy with the response you received, you can also refer the matter to the UK Information Commissioner.

We have further committed to refer unresolved privacy complaints under the EU-US Privacy Shield Principles to the EU Data Protection Authorities. Please contact the EU Data Protection Authorities for more information and to file a complaint, at no charge. Further details, including in relation to filing a complaint is available on the Global-e Privacy Shield page at:

<https://www.privacyshield.gov/participant?id=a2zt00000004ENIAA2&status=Active>.

Additionally, if you are an EU data subject, you can invoke binding arbitration in certain cases, as Annex I of the EU-U.S. Privacy Shield Agreement describes. For further information, please visit the Privacy Shield website at: www.privacyshield.gov, or contact our privacy team.

17. Additional information for residents of the following countries:

17.1. Australia

For the purposes of this Policy, “personal data” means any information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true, or opinion is recorded in a material form. We are committed to keeping your personal information secure and will use all reasonable precautions to protect it from loss, misuse or unauthorized access or alteration. However, except to the extent liability cannot be excluded due to the operation of statute, we exclude all liability (including in negligence) for the consequences of any unauthorized access to, disclosure of, misuse of or loss or corruption of your personal information. Nothing in this Privacy Notice restricts, excludes or modifies or purports to restrict, exclude or modify any statutory consumer rights under any applicable law including the Competition and Consumer Act 2010 (Cth). If you are unhappy with this Policy, you may submit a complaint to the Office of the Australian Information Commissioner.

17.2. Hong Kong

Terms used in this Policy shall have the meaning ascribed to them in the Personal Data (Privacy) Ordinance. Under the Personal Data (Privacy) Ordinance, individuals must be notified at the point of collection of the purposes for which the data was collected and thereafter the data can only be used for those purposes unless consent is obtained for a new purpose. If you are not happy with this Policy, you may submit a complaint to the Office of the Privacy Commissioner for Personal Data.

18. Changes to this Privacy and Cookies Policy.

From time to time, we will update this policy. If the updates have minor if any consequences, they will take effect 7 days after we post a notice on the Service's website. Substantial changes will be effective 30 days after we initially posted the notice.

Until the new policy takes effect, if it materially reduces the protection of your privacy right under the then-existing policy, you can choose not to accept it and terminate your use of the Service. Continuing to use the Service after the new policy takes effect means that you agree to the new policy. Note that if we need to adapt the policy to legal requirements, the new policy will become effective immediately or as required by law.

19. Incorporation to the Terms of Use and Subscription Agreement.

This Policy forms part of the terms and conditions of our Service.

20. Contact Us.

Please contact us at: dataprotection@global-e.com for further information.

In addition, you may contact our European representative, RICKERT Rechtsanwaltsgesellschaft m.b.H. Kaiserplatz 7 - 9, 53113 Bonn, Germany. Telephone No: 0049 228 74 898 0 Email: kanzlei@rickert.net

Last updated: 01 January 2020

Cookies Policy

Global-e (“Global-e” or “we”) wants to ensure that your use of our Service is smooth, reliable and as useful to you as possible. To help us do this, we use cookies and similar technologies, such as tags/beacons and javascripts (“cookies”), to make our Service relevant to your interests and needs.

1. What are cookies?

Cookies are small text files that are automatically placed on your computer or mobile device when you use our Service. They are stored by your internet browser. Cookies contain basic information about your internet use. Your browser sends these cookies back to our Service every time you revisit it, so it can recognize your computer or mobile device and personalize and improve your browsing experience.

2. What Are ‘Session’ and ‘Persistent’ Cookies?

“*Session Cookies*” are removed from your computer once you close your browser session.

“*Persistent Cookies*” last for longer periods on your computer - after you close your browser session.

A user can delete previously set persistent cookies manually or configure the browser settings to delete cookies, as further described below.

3. What Are ‘First-party’ and ‘Third-party’ Cookies?

First-party cookies are set directly by the website that the user is visiting. For the purpose of this policy, these are cookies that are set directly by our Service.

Third-party cookies are set by a domain other than the one visited by the user. For the purpose of this policy, these are cookies that are set by Service on the checkout page.

4. What Are ‘Similar Technologies’?

Functions usually performed by a cookie can be achieved by other means. This could include, for example, using certain characteristics to identify devices so that visits to a website can be analyzed.

Any technology that stores or accesses information on a user’s device is relevant for this purpose, and therefore it includes, for example, HTML5 local storage, Local Shared Objects and fingerprinting techniques.

Additionally, technologies like scripts, tracking pixels and plugins, wherever these are used – are also considered as similar technologies. For example, the retailers may, conduct electronic marketing and incorporate a tracking pixel in email messages. The pixels record information including the time, location and operating system of the device used to read the email.

5. What type of cookies do we use?

We use both Session Cookies and Persistent Cookies as part of your experience on our Service so that we can facilitate the use of the data’s features and tools, keep track of your preferences as well as improve our service by creating better designs for you. Some cookies are strictly essential for the operation of our Service while other cookies help to improve. The same rule goes for all the tracking technologies that we use. We have created a detailed tracking technologies table page, which is attached as an Appendix A to this policy and is available [here](#). The table will provide you with a clear and comprehensive image of the tracking technologies that we use.

When a tracking technology contains personal data, as indicated in Appendix A, then our Privacy Policy applies as well.

The cookies we use fall into 3 categories. These categories are described below:

<u>Essential and functional cookies</u>	Essential cookies are necessary to help you access and move around our Service and use all its features. We also use functional cookies, for example to remember your language preferences to save you the trouble of having to change every time you enter our Service. Without these cookies, our Service would not work properly, and you would not be able to use certain important features.
<u>Analytics cookies</u>	We use cookies to help us understand how visitors arrived at our Service, how and how long they use it and how we can improve their experience. This type of so-called "analytics" cookies can provide us with anonymous

	<p>information to help us understand which parts of our Service interest our visitors and if they experience any errors. We use these cookies to test different designs and features for our sites and we also use them to help us monitor how our visitors reach our sites.</p> <p>To place these cookies, we use Google Analytics. We have set our Google Analytics to protect your privacy to the maximum extent. For example, we have concluded a data processing agreement with Google to protect your data. We have also made sure that the last octet of your IP-address is invisible and have turned off the setting which allows sharing data with Google. We are also not using any other Google Analytics related cookie services which are offered by Google</p>
<p><u>Advertising, marketing and social media cookies</u></p>	<p>We only place advertising, marketing and social media cookies if you have given us your permission to do this.</p> <p>Advertisement and marketing cookies collect information about your browsing habits in order to make our content and advertising as relevant to you and your interests as possible. These cookies are also used to help us measure the effectiveness of our advertising campaigns by tracking the number of clicks. The cookies are usually placed by third party advertising networks. They remember the websites you visit and use this information to give you access to interesting and exciting content on our Service and to show you more personalized adverts when you visit other websites. These cookies also help improve your browsing experience, for example by helping to prevent the same advertisement from continuously reappearing to you.</p> <p>Additionally, social media platforms such as Facebook and Twitter can use cookies to see if you are logged in and allow you to "like" content or forward it to your friends. Depending on your settings, these third parties may use your information for their own purposes, such as advertising. If you would like to know more how these social media platforms use data, please refer to the privacy notices of these platforms</p>

6. Obtaining your consent for using tracking technologies

We need your consent to use tracking technologies that are not essential and functional, as indicated above. If you do not agree to accept our cookies or other tracking technologies that are not essential and functional for the operation of our website, we will make commercially reasonable efforts to provide you with the same level of services without using such cookies or other tracking technologies.

7. Withdrawing your consent

You can withdraw your consent to advertising, marketing and social media cookies by contacting dataprotection@global-e.com.

8. Managing your cookie settings and deleting cookies

As explained above, we only place advertising and targeting cookies (including tracking cookies) if you have given us your consent for doing this. If you have given us your consent but would like the cookies that we have placed to be removed, you can do this by deleting them via your browser. Search for "cookies" under your web browser's "Help menu" or "Setting" section.

Here are some links to some commonly used web browsers: (a) Google Chrome; (b) Microsoft Edge; (c) Mozilla Firefox; (d) Microsoft Internet Explorer; (e) Opera; (f) Apple Safari.

In addition, you can turn off certain third party targeting or advertising cookies by visiting the following links: Network Advertising Initiative, the [Digital Advertising Alliance Consumer Choice](#) and [Your Online Choices](#) pages.

To find out more about cookies, including how to see what cookies have been set, you can visit the following websites: www.aboutcookies.org and www.allaboutcookies.org.

Please note that, if you choose to delete Global-e cookies, your access to some functionality and areas of our Service may be degraded or restricted.

Some web browsers offer a “Do Not Track” (“DNT”) signal. A DNT signal is an HTTP header field indicating your preference for tracking your activities on our services or through cross-site user tracking. This Service do not respond to DNT signals.

9. Further information about our use of data

You can find more information about the way we handle personal data in our [Privacy Policy](#).

10. Questions, comments or in need of help?

If you have any questions or if we can help you with something, we would be happy to assist if you contact us at: dataprotection@Global-e.com.

11. Changes to this policy

We update this policy, where needed. Every time we change this policy, we either send you an email about it or post a notice on our Service. We will post a notice on our Service if our policy update includes substantial changes and obtain your consent once again, where required under applicable laws.

This policy was last updated in January 2020.

Appendix A: Tracking Technologies Table

Essential and functional cookies

These cookies are strictly essential for enabling your movement around our Service and providing access to features such as your profile and purchases, member-only services, and other secure areas of our Service. This category of cookies cannot be disabled.

Name	Purpose & Expiration Date	First/Third Party Cookie
GlobalE_Data	Main cookie used by both the Global-e extensions and client libraries, this cookie holds the browsing information of the customer. Exp. 72 Hours	First + Third Party
GlobalE_Tags_Data	Cookie for analytics and statistics of the client behavior on the website. Exp. End of Session	First
GlobalE_CT_Data	This cookie holds a unique client identifier for a customer (per browser), which helps Global-e to provide information about the client behavior on a Global-e enabled website. Exp. 72 Hours	First + Third Party
GlobalE_Welcome_Data	This cookie is placed in order to determine whether the customer should be presented with the Global-e welcome popup. Exp. 72 Hours	First
GE_CART_TOKEN	This cookie holds the card details, in case the need to recreate the cart. Exp. 72 Hours	First
GlobalE_GECT_Data	This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. Exp. 2 Years	Third Party
GloablEIsOperated	This cookie determine whether the country is operated. Exp. 72 Hours	First
_cfduid	CloudFlare cookie, used to speed up load time. used to override any security restrictions based on the IP address the visitor is coming from. It does not contain any user identification information. Exp. 8 Month	Third Party
forterToken	This cookie stores the Forter-generated device identifier. It identifies the browser between browsing sessions Exp.5 years	Third Party
Ftr_ncd	a flag used to make sure data is not sent more than once per predefined timeframe Exp. 5 Years	Third Party

Analytics Cookies

Analytics cookies collect information about how visitors use our Service. Our service providers can transfer relevant information to third parties where required by law or where such third parties process such information on their behalf.

Name	Purpose & Expiration Date and Opt-Out	First/Third Cookie	Party
_ga	This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. Exp. 2 years	Third Party	
_gcl_au	Used by Google AdSense for experimenting with advertisement efficiency across websites using their services. Exp. 10 Days	Third Party	
_gid	This cookie name is associated with Google Universal Analytics. store and update a unique value for each page visited. Exp. 24 Hours	Third Party	
cid	This cookie is used to improve advertising for website visitors. It can redirect more relevant advertisements to the visitor, and helps improve reports on campaign performance. Exp. 1 Year	Third Party	
_fbp	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers. Exp. 3 Months	Third Party	