

Global-e Consumer Privacy Policy

Last updated: August 2024

This Privacy Policy (“**Policy**”) governs how Global-e (“**Global-e**”, “**we**”, “**our**” or “**us**”) collect, receive, use, store and disclose Information (sometimes referred to as “**Personal Information**”, as defined below) about individuals in connection with the use of our services for the sale of products to you, or if applicable, such other services which are explicitly indicated in this Policy (“**Services**”). References to Global-e (or “**we**”, “**our**” or “**us**”) will refer to the Global-e group including the entities, subsidiaries and affiliated companies listed [<<here>>](#), and will also include the site operating as “**Borderfree.com**” and the services offered thereunder (which if offered, will form part of the Service).

This Policy explains our privacy practices for processing Personal Information, as defined below, related to our Services. We will collect, use or disclose your Information only in accordance with the terms of this Policy.

If you do not wish your Information to be collected, please do not submit it. However, please bear in mind that we will not be able to process your order or be limited in performing all or part of our Services without receiving your details.

If you are a resident of, or placing your order for fulfilment into one of the countries listed in the section of “[Additional information for users of certain jurisdictions](#)” then the additional and specific terms may apply to you. Please review them.

Global-e may change and update the terms of this Policy from time to time. If we decide to change our Policy materially, we will post the revised Policy on our website with an updated effective date and we will inform you of such changes by any appropriate means. If you continue to use the Service after these changes are posted, you confirm to have read and acknowledged the revised Policy.

Policy Summary/Notice at Collection

For your convenience, we included below a summary of this Policy. This will give you an overview of our practices. Please take the time to read our full Policy for detailed information on each section.

Why we collect your Information

We collect your Information only when we need to, mainly for providing the Services and performing the contract with you. In some cases, we collect your Information following your consent or for our legitimate interests, as detailed further. We may also collect your Information if bound by legal obligations.

How we collect Information

We collect Information directly and indirectly from you, when you fill out your details in the checkout page, contact customer service, or when interacting with the services on the webstore. We also receive information from our third parties such as the Store Owners.

Information we collect

For fulfilling the Services, we will need your Personal Information such as your name, email address and delivery address. We will also need your payment details (e.g. credit card number) to have your payment processed by our contracted payment processors. If you contact our customer support, we will need any other relevant Information, that will help us to solve the inquiry.

How we use your Information

We use your Information for performing the contract with you and for our related legitimate interests. This includes improving the Services and our products, supporting Store Owners, testing new features and protecting our Services from any misuse and legal violations. We may, subject to obtaining your consent or otherwise subject to taking all required legal measures, use your Information for communicating specific offers, promotions or market activities related to our Services. If you have agreed to such communication, you will be able to unsubscribe from them at any time.

For improving your cross-border shopping experience, we collect information by using different types of cookies. We automatically log 'traffic/session' information including your IP addresses, all as detailed under our Cookie Policy available using this <<[link](#)>>, so please make sure you review it. Our Service does not respond to Do Not Track (DNT) signals. Data used for analytic purposes is aggregated and/or anonymized, and we may use it without sending any further notice.

We may also collect identity number (local ID, passport) if such information is required by your country for example to facilitate customs clearance or remittance of import taxes and duties.

Sharing your Information

We will share Information that we collect with third parties for fulfilling your order in relation to the Services. This includes, for example, the Store Owner operating the site where you placed your order, payment processors or facilitators and the order's chosen carrier. If you provided your specific consent, we would provide the Store Owner with your Information for the Store Owner's marketing purposes.

We will also share your Information with third party service providers and other providers, including those who provide us analytics tools, as detailed in our Cookie Policy, 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, and all in connection with performing or rendering the Services.

The sharing or disclosure of your Information to the Store Owner or to any third-party mentioned in this Policy are strictly required for the performance of the Services. You should also read the privacy policies of the Store Owners.

We may also share your Information to comply with a court order or a request from a public authority.

We will not sell your Information.

Protecting your Information

We take steps to de-identify and anonymize parts of your 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).

Children's privacy

We do not intend to collect Information from anyone we know to be under the legal minimum age in each jurisdiction where the Service is available ("**Minimum Age**"). If you believe that we have collected such information, please contact us at dataprotection@global-e.com.

Sharing Information in case of a structural change

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. We base such processing operations on our legitimate interest(s), as well as on certain legal obligations we may be subject to.

Other sites and services

For completing your online orders and providing the Services, you may be redirected by links to third party websites (for example, you may elect to pay for your order using PayPal), that are subject to their own privacy policies (please read these policies and make sure you understand them).

Your rights and choice under data protection laws

We do our best to protect your Information, and allowing you to fulfill all of your right under local privacy laws. You may terminate your use of the Services at any time.

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. We respect your rights under local privacy laws and within the legal limits, such as the right for data retention and your rights to access the information, to correct and to request from us to delete records from our systems. At any time you can send requests by contacting us at dataprotection@global-e.com.

Not all your requests can be fulfilled at the time of contacting us due to regulatory requirements. However, we keep Information only for legitimate and lawful purposes, and only for the duration required for complying with applicable laws.

Transferring Personal Information outside your territory

Global-e adheres to applicable laws and regulation regarding the transfer of Personal Information across jurisdictions and geographical regions.

- Global-e data servers are located in the European Economic Area ("EEA"). If you used Global-e services, your data is stored and processed in Ireland.

- Borderfree services are located in the USA. If you used Borderfree services, your data is stored and processed in the USA.

We transfer Information within the Global-e group, only in accordance with the law and this Policy based on the place of your residency and the sub-processors fulfilling the transaction. Data transfers are protected under legally binding agreements. If you are located in the European Union, the UK or Switzerland, your information is protected under the Standard Contractual Clauses or pursuant to applicable Transfer Adequacy Decision.

Dispute Resolution

Contact us at: dataprotection@global-e.com. We will make good-faith efforts to resolve any existing or potential dispute with you.

Additional information for users of certain jurisdictions

If you are a user in certain jurisdictions, we have some clarifications and further information for you in relation to the applicable local law. Please read the section “**Additional information for users of certain jurisdictions**”.

Contact us

Please contact us at: dataprotection@global-e.com for further information. Our EU-GDPR representative according to Art. 27 GDPR is Rickert Rechtsanwaltsgesellschaft mbH, Colmantstraße 15, 53225 Bonn, art-27-rep-global-e@rickert.law.

Our UK representative is Globale UK Limited, of 154 Clerkenwell Rd, London EC1R 5AB, UK, dataprotection@global-e.com.

Global-e Privacy Policy

Why we collect your Information

We collect your Information only if it is required. When you shop from store owners we fulfill their orders (“Store Owners”), and use our Services, we need to process the transaction and make sure the products are delivered to you. For fulfilling the Services, we will need your Information, such as your name, email address and delivery address. We will also need your payment details (e.g. credit card number) to have your payment processed by our contracted payment processors. If you contact customer support, other relevant information will be needed to help solve the inquiry. In some cases, we collect your Information following your consent, for our legitimate interests or if bound by a legal obligation, as detailed further.

Information we collect

For providing you with the Services, we collect your first name, last name, email, phone number, postal address and payment information including the payment method and payment details (or payment voucher details) that you provide us. We may also collect identity number (local ID, passport) if such information is required by your country for example to facilitate customs clearance or remittance of import taxes and duties. If you have contacted Global-e customer services with enquiries, we will receive and process any Information that you provide us for resolving such matter.

How we collect Information

Purchases. We receive and collect Information directly from you when you interact with any of the Global-e, Borderfree or Flow checkouts. When you place an order for the purchase of merchandise offered on the Store Owners’ sites, we fulfill such orders and you provide us with the information required for processing your online transaction and for delivering the order to your chosen delivery address or providing customer support in accordance with our Terms of Sale. If you have a Borderfree account, you already provided us with parts of your Information through your Borderfree user account. Please refer to the [specific terms and policy that applies to such Borderfree user account](#).

Store Owners. In certain cases, where for example, you are pre-registered with the Store Owner or the payment method, we may receive part of the Information from the Store Owner to pre-populate transaction in forms for ease of completion by you.

Log Files. We use log files that, where permitted by applicable law, we collect automatically from your computer or device when you interact with the Services. The information contained in log files includes internet protocol (or IP, which is 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 us.

Cookies. We use cookies and similar tracking technologies to make sure that our Service is continuously improved and meets your needs. Please review our full Cookies Policy for more information on the types of cookies we use and their expiration dates. We use essential cookies for providing, improving, and optimizing our Services and your experience. Our cookies include cookies provided by third parties used to secure your transaction and to create static reports based on aggregated and anonymized Data. We use standard analytics tools such as of Google Analytics, Hotjar, Heap and Fullstory (the full and current list is stated in the Cookie Policy).

Do Not Track (“DNT”)

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 does not respond to DNT signals.

Using your Personal Information

By choosing to use the Services for the purchase of goods, you provide us with the legal basis to use and retain your Information as needed to provide you the Services and to improve them.

As a matter of legitimate interest, or business purpose, if applicable, and to the extent permitted by applicable law, we may use your Information to maintain our business relationships and operations, including to support Store Owners, testing new features and prevent and detect fraud and abuse of our Services. In addition, we may also create aggregated statistical data, inferred non-personal data or anonymize data for personalizing your user experience, troubleshooting and to ensure our content and Services are presented in the most effective and relevant manner for you and your device.

We may use the Information to communicate with you in relation to the Services, and in relation to security inquiries or other administrative communications related to transactions you have initiated or completed through our Services. Such communication might include request to identify or authenticate your access to the Service, and are required for maintaining the integrity and security of our customers and systems, Services and business. Please note that such communications are not related to marketing, and therefore, we do not rely on or require your consent.

Analyzing anonymous, aggregated and analytical Information

To the extent permitted by applicable law, we may share anonymize information, or aggregated information from multiple users with the Store Owners, marketing and public relations agencies, or other third parties including our subsidiaries and affiliated companies. This information does not contain Personal Information. We have secured procedure for de-identifying or anonymizing your Information. This ensure that this data cannot be re-identified. When using anonymized information, 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 data that cannot identify an individual user, whether directly or indirectly, and such identification is irreversibly prevented, such as aggregated data about the use of our Service. Therefore, such data does not constitute “Information” and the use and disclosure of same would not affect any of your rights under applicable privacy laws.

Direct Marketing from Store Owner or Borderfree.com

You will be offered the ability to provide your specific consent via our Service to receive direct marketing materials by either email, telephone, text message or post, relating to consumer goods and services generally available via our Service, including offers by brands from which you may have previously purchased through us or which may be of interest to you.

Your Information may be used for direct marketing sent by Borderfree.com, provided your consent was duly given. You have the right to object to the processing of your Information specifically for direct marketing purposes.

If you wish to opt-out from direct marketing communication please contact us for any communication received from Borderfee.com. If you received communication from the Store Owner, please contact the Store Owner directly. Alternatively, you can use the ‘unsubscribe’ features made available through the relevant marketing communication.

Sharing your Personal Information

For providing you with the Services, we will share you data with the following third parties:

Store Owners. In connection with using our Services to make purchases of products available on webstores, we will share the Information with such specific Store Owner who operates the website through which you made your purchase. Such Store Owner will then be entitled to use your Information as if that Store Owner has collected this information directly, subject to the Store Owner's own privacy policy. For instance, the Store Owner needs to know that you have made a purchase in order to process its delivery, to handle any requests with respect to the items you purchased or process returns/replacements. The Store Owner may also need to use the Information to validate your subscription or membership or otherwise allow you to take advantage of any loyalty scheme that it administers.

Using Global-e affiliates for Information processing. We will share your Information with our subsidiaries and group companies (listed <<here>>) if your purchases are made from locations which require such transfer for the performance of the Services or delivery of your order, or for such other data processing related to the acquiring of your order, customs clearance and import formalities or fulfilling tax filing obligations directly related with the fulfilment of your order. We will also share and transfer Information to our 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 jurisdictions around the world where our servers and systems are located, as described under the "Transferring Personal Information outside your Territory" below.

Using third party service providers. We will share (insofar as such sharing is necessary) your Information with our third-party service providers (such as hosting providers, payment processors, fraud detection and prevention service providers, licensed customs brokers, data and website analytics services and order fulfilment providers) whose tools, software, and services we use to process and complete your transaction(s).

We do not sell your information to others, and do not share your Information with third-parties other than as outlined under this Policy, or to the extent necessary for providing you with the Services.

Legal Obligation and necessary disclosure. We may use the Information to comply with any applicable legal obligations, to enforce any applicable terms of service and to protect or defend the Services, our rights, the rights of our users/customers or others. We will disclose your Information or any information you submitted if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to comply with any applicable law, regulation, legal process or governmental request; enforce the terms of sale, including investigations of potential violations thereof; detect, prevent, or otherwise address fraud or security issues; or protect against harm to the rights, property or safety of Global-e, its users, yourself or the public.

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 or required by applicable law, your consent obtained for those new purposes. We base such processing operations on our legitimate interest(s), as well as on certain legal obligations we may be subject to.

Transferring Personal Information outside your territory

Global-e adheres to applicable laws and regulation regarding the transfer of Personal Information across jurisdictions and geographical regions.

- Global-e data servers are located in the European Economic Area ("EEA"). If you used Global-e services, your data is stored and processed in Ireland.
- Borderfree services are located in the USA. If you used Borderfree services, your data is stored and processed in the USA.

For providing you with the Services, and as part of our cross-border operations, the Information we collect from you may be transferred to Israel, the United Kingdom (UK), the European Union and the United States, and shared between Global-e entities, and additional parties, including the Store Owner and other service providers and sub-processors for fulfilling our Services. We require such third parties to process such information in compliance with Global-e policies and procedures.

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

If you are a resident of, or placing your order for fulfilment into one of the countries listed in the section of **“Additional information for users of certain jurisdictions”**, additional and specific terms may apply to you. Please review them.

Protecting your Information

We follow generally accepted industry standards, including the use of appropriate administrative, physical and technical safeguards, to protect the integrity and security of the Information. For example, certain sensitive Information (such as data relating to fraud) is transmitted over a Secure Sockets Layer channel and is encrypted; our payment gateway is Payment Card Industry compliant. However, no method of transmission over the internet, or method of electronic storage, is 100% secure.

Your Information will also be retained by us as necessary to and relevant to our legitimate operations, including time necessary to identify, issue or resolve legal proceedings, enforce our terms of sale, to meet our reporting requirements and as otherwise required in accordance with applicable law obligations.

We will take appropriate steps to delete or permanently de-identify (as permitted by applicable law) or anonymize Information at the point such information is no longer needed by us for our legitimate business or legal obligations. 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.

Your Choice

We request and collect minimal data needed for the purposes described in this Policy. At any time, you may opt to terminate your use of the Service. 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 “Protecting Personal Information” section in this Policy.

Your rights under data protection laws

In accordance with the laws applicable to you within your geographical region, you may have the following rights with regard to you Information.

Access the Information. 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. We may need to ask you to provide us certain credentials to make sure that you are who you claim you are. 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 make good-faith efforts to locate your Information that you request to access.

Rectify the Information that we keep about you. If you find that the Information is not accurate, complete or updated, then you may provide us with the necessary information to rectify it.

Delete your Information. In some cases, you have the right to obtain the erasure of Information concerning you. We will review your request and use our judgment, pursuant to the provisions of the applicable law, to reach a decision about your request.

Restrict the processing of your Information. In some cases, you have the right to obtain restriction of the processing of your Information.

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.

Objection to processing. In certain circumstances, for processing operations based on our legitimate interest(s), you have the right to require us to stop processing your Information that we hold about you. When your Information is processed for direct marketing purposes, you have the right to object at any time to the processing of the Information for such direct marketing purpose. Please contact us or the relevant Store Owner directly to opt out of their marketing activities, or use the 'unsubscribe' features made available through the relevant marketing communication.

Automated decision-making, including profiling. You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affecting you.

Children's Privacy

The Service is not structured to attract or be directed to anyone under the age of 16 years or the Minimum Age applicable in your jurisdiction. Accordingly, we do not intend to collect Information from anyone we know to be under 16 years or the relevant Minimum Age. In certain countries, as listed in the section of "***Additional information for users of certain jurisdictions***", the Minimum Age may be different.

If we learn that we have collected Information from a person who is younger than 16 years or the applicable Minimum Age, we will delete that information quickly. If you believe that we have any such information, please contact us at: dataprotection@global-e.com.

Other Sites and Services

The Service contains 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.

Changes to this Policy

From time to time, we will update this Policy. If the updates have minor to no 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 Services. Continuing to use the Services 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.

Contact us

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

You can contact our DPO at: dpo@global-e.com.

For information about our Global-e affiliates please press [here](#).

Additional Terms for Borderfree Costumers

As a Borderfree costumer, Global-e Privacy Policy applies to your use of the Borderfree services and offerings, all under the auspice of Global-e. This Annex includes additional information relevant to you if you have registered as a Borderfree.com user and provided your consent to receive marketing communications from us.

Collecting Personal Information

User Account. We collect information from you when you interact with the Borderfree website, and when you provide information via any user account as more fully described in the Borderfree Terms & Conditions at https://www.borderfree.com/terms/en_us.

Information provided by you for you User Account. You will be required to provide Information. You will receive the option to use such details as default to pre-populate your future transactions with Borderfree. We will not use your Information as default unless you provided your consent. You can change your details and opt-out from default setting anytime.

Credit Card data or other Payment Information. You will be offered the option to provide Borderfree with your payment information. If you choose to do so, your payment information can be saved and used as default or preferred payment method when checking-out from a supported webstore. By setting your payment details as default, you provide Borderfree the ability to enhance and improve your shopping experience by pre-populating the transaction from the Store Owner.

If you choose to use such default setting, you consent to Borderfree keeping your payment details in an encrypted authentication token. We will only store the last four digits numbers of you payment card, the card type and the expiry date. Those will also be displayed to you on your account for your review. The full card data are not stored by Borderfree or Global-e entities. Your full card data are only stored and processed by the payment services provider.

Protecting your User Account

In accordance with this Policy, we take measures to secure and protect your account and your payment information according to the PCI Card Data Tokenization and Encryption tokenization guidelines.

Direct Marketing. If you are a Borderfree costumer, and you have provided your consent to receive marketing communications from us, we will use your Information for sending you relevant content from us, including promotions and our partner brands' promotions, sales, events and other special offers from our affiliate partners. You may also receive customer service communicating requesting your feedback on the Services offered. We provide you the choice as to whether you would like to receive such marketing content from "Broderfree.com."

Where you have consented to receive such communication, then in accordance with applicable law, these communications could be in the form of an email or text message to a mobile telephone and will contain information relating to us, our partners or a Retailer's products and services. At any time, you may opt out of receiving these communications by either unsubscribing following the instructions in the email/text you received, or sending a request to CustomerCare@borderfree.com or dataprotection@global-e.com, or by following any unsubscribe instructions in email communications. Please note that subject to applicable law, if you had given your consent to any of our partners or a Retailer, you should contact them directly (or unsubscribe directly through their communications with you).

Additional Information for users of certain jurisdictions

Additional Information for Residents of the EU or the UK

If the General Data Protection Regulation (Regulation (EU) 2016/679) (the “GDPR”) or the UK General Data Protection Regulation and the UK Data Protection Act 2018 (together the “UK DPA”), applies to the processing of your Information that can directly or indirectly identify you, by Global-e, as a data controller, then the following terms apply in addition to, and shall take precedence over, the Policy.

For the purposes of this Policy, Information shall have the meaning ascribed to "personal data" by the GDPR – i.e. any information relating to an identified or identifiable natural person.

Legal Basis, Data Transfers to Store Owners

The processing of your Information by Global-e is mainly based on the fact that it is necessary for providing the Services and more broadly for the performance of your contract. Additionally, we may ground our processing on your consent, on Global-e's legitimate business interest or on legal obligations we are subject to, each as described under the Policy.

Information will be shared with Store Owners as detailed above to the extent necessary for the processing of your order (i.e. performance of your contract) and also for the purposes of the Store Owners’ legitimate interests in promoting the sale of their products. Information transmitted will be further controlled by the Store Owners, so please refer to their privacy policies. Where your consent should be required for a particular form of processing or use, it will be specifically requested.

DPO & EU/UK Representatives

If EU or UK data protection law applies or if you are located in the EEA, you may contact our DPO at dpo@global-e.com. Our EU GDPR representative according to Art. 27 GDPR is Rickert Rechtsanwalts-gesellschaft mbH, Colmantstraße 15, 53225 Bonn, art-27-rep-global-e@rickert.law. If UK data protection law applies to the processing of your Information, you may contact our UK representative, Globale UK Limited, 154 Clerkenwell Rd, London EC1R 5AB, UK, email dataprotection@global-e.com.

Rights under data protection laws

If you are a resident of the EEA or the UK, you are entitled to your rights as detailed under this Policy.

If you are based on the EEA 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 GDPR. If UK data processing laws apply to our processing of your Information, you have a right to lodge a complaint with the UK Information Commissioner’s Office. 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.

You also have the right to receive a copy of your Information in a structured, commonly used, and machine-readable format. Additionally, you have the right to request that we transmit this Information directly to another controller, where technically feasible. This right applies to Information you have provided to us, and it is processed based on your consent or for the performance of a contract with you.

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.

Data Storage

We are committed to ensuring that your Information is retained only for as long as necessary to fulfill the purposes for which it was collected, as outlined in this Policy, and in compliance with the GDPR's storage limitation principle.

We may retain your Information for a longer period when it is necessary for compliance with a legal obligation to which we are subject, including, but not limited to, tax, accounting, or other statutory obligations.

In certain cases, we may retain your Information beyond the retention period if it is necessary for our legitimate interests, such as enforcing our terms and conditions, defending against legal claims, fraud prevention, or safeguarding the security and integrity of our systems, provided that such interests do not override your fundamental rights and freedoms.

Once the retention period has expired, or upon your request where applicable, we will securely delete, destroy, or anonymize your Information to ensure it cannot be reconstructed or read.

Data Transfers outside the EU or the UK

As we are an international company, we may securely share your Information with other Global-e entities and our approved partners located all over the world where necessary for the fulfilment of your purchases and performance of our services, as detailed in this Policy.

As detailed under "[transferring Personal Information outside your territory](#)", Global-e data servers are based in the EU, and Borderfree data servers are based in the US.

The transfer of your Information outside the EEA and UK is protected by the Standard Contractual Clauses in accordance with the European Commission's contracts model for the transfer of Information to third jurisdictions, unless the data transfer is to a jurisdiction that has been determined by the European Commission (for transfers from the EEA) or the UK Information Commissioner's Office (for transfers from the UK) to provide an adequate level of protection for individuals' rights and freedoms for their Information. When we transfer your Information, we will make sure that our data hosting service providers, or any other third party recipient, provide adequate confidentiality and security commitments required by law. In order to obtain a copy of the Standard Contractual Clauses applicable to transfers outside the EEA and UK, please contact our Representative at the address listed above.

At this time, the U.S. is not recognized by the European Commission or the UK Information Commissioner's Office as a jurisdiction which offers an adequate level of data protection. Your Information, which is transferred to the U.S., can be processed by U.S. law enforcement agencies, or any other entities under the applicable U.S. law. If you are an EU citizen or resident, or if UK data protection laws apply to you, please note that U.S. laws place limitations on remedies in respect of the processing of your Information by the U.S. authorities, including limitations on the right or ability to bring a legal action to a court of law, or to appear in a court.

Additional information for Resident of Australia

For the purposes of this Policy, “Information” 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 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 including the Privacy Act 1988 (Cth), 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 Information.

Transferring Personal Information Outside your Territory

As we are an international company, we may securely share your Information with our Affiliates and our approved partners located all over the world where necessary for the fulfilment of your purchases and performance of our services, as detailed in this Policy.

By consenting to overseas disclosure, you acknowledge that we do not guarantee that the overseas recipient will comply with the Australian Privacy Principles and they may not be subject to privacy obligations similar to those in your jurisdiction, as detailed under “[transferring Personal Information outside your territory](#)”. We will not be liable to you for breaches of the Australian Privacy Principles committed by the overseas recipient.

When we transfer your Information, we will make sure that our data hosting service providers, or any other third party recipient, provide adequate confidentiality and security commitments. We take reasonable steps to ensure that third party recipients of your Information that are located outside Australia do not breach the Australian Privacy Principles and comply with privacy laws that are similar to those of your jurisdiction, you acknowledge and agree that we cannot control the actions of third party recipients and so cannot guarantee that they will comply with those privacy laws.

Nothing in this Policy restricts, excludes or modifies or purports to restrict, exclude or modify any statutory consumer rights or other rights under any applicable law including the Competition and Consumer Act 2010 (Cth) or the Privacy Act 1988 (Cth). If you are unhappy with this Policy or you have a complaint about compliance with the Australian Privacy Principles, please contact us at: dataprotection@global-e.com. We will respond to your complaint and make good-faith efforts to resolve your complaint within a reasonable time (and in any event within 30 days). If you are not happy with how we have dealt with your complaint, you may submit a complaint to the Office of the Australian Information Commissioner via the website at: <https://www.oaic.gov.au/privacy/privacy-complaints/>.

Additional information for Resident of China Mainland

Children's Privacy

The Service is not structured to attract or be directed to anyone under the age of 18 years without parental consent. Accordingly, we do not intend to collect Information from anyone we know to be under that minimum age.

If we learn that we have collected Information from a person who is younger than 18 years without parental consent, we will delete that information quickly. If you believe that we have any such information, please contact us at: dataprotection@global-e.com.

Processing Personal Information outside your Territory

We provide our Services and process your personal information outside mainland China. By using our Services, you will be providing your personal Information to Global-e and our affiliates located outside mainland China and your personal information will be processed in Ireland and/or other jurisdictions where our servers and databases are located. Your Information will be securely shared with our Affiliates and our approved partners located all over the world where necessary for the fulfilment of your purchases and performance of our services, as detailed in this Policy.

By agreeing to this Policy, you consent to your Information and sensitive personal Information being collected, used, and disclosed in accordance with this Policy.

Your Information will be secured by substantially appropriate safeguards as set forth in China Data Protection Law. To the extent required under the China Data Protection Law, we will obtain separate consent from you before the transfer of your Information to a third party.

Your rights and choice under China Data Protection Law

In accordance with the terms of the applicable China Data Protection Law, Individuals must be notified at the point of collection of the purposes for which the Information was collected and thereafter the Information can only be used for those purposes unless consent is obtained for a new purpose.

In accordance with the terms of the applicable China Data Protection Law, you may have the following rights to your Information, including the rights detailed under this Policy to request access to, and transfer, correction or deletion of, your Information, and withdrawal of your consent to, or restriction or objection to the processing of your Information, and cancellation of your account. You also have the right to request us to explain our Information processing rules. To the extent permitted by applicable China Data Protection Law, a fee may be chargeable by us for complying with a data access request. In certain instances, applicable China Data Protection Law may allow us legitimately and properly to refuse some of these requests; for instance, to comply with applicable legal obligations or to protect the legitimate rights of third parties.

For the purposes of this Policy, China Data Protection Law shall mean the Cybersecurity Law of the People's Republic of China ("PRC"), the PRC Data Security Law, the PRC Personal Information Protection Law, and all related, then current data protection provisions under the PRC Civil Code, other data protection related laws, regulations, administrative rules, administrative measures and national guidelines effective in China Mainland (together as "China Data Protection Law").

Additional Information for Residents of Hong Kong

The Service is not structured to attract or be directed to anyone under the age of 18 years. Accordingly, we do not intend to collect Information from anyone we know to be under that minimum age.

If we learn that we have collected Information from a person who is younger than 18 years or under 14 years without parental consent, we will delete that information quickly. If you believe that we have any such information, please contact us at: dataprotection@global-e.com.

Transferring Personal Information outside your Territory

As we are an international company, we may securely share your Information with our Affiliates and our approved partners located all over the world where necessary for the fulfilment of your purchases and performance of our services, as detailed in this Policy.

In accordance with Section 33 to the Ordinance, by using our Services you agree to your Information, being exported outside your territory, including your name, email address, physical address, telephone number, ID number or credit card/payment details. You consent to the Information being processed in the Economic Area of the European Union, and transferred between Global-e entities, as detailed under "[transferring Personal Information outside your territory](#)", including to the European Union and the United States, in order to provide you with the Services, or to other third-party such as shipping providers, the Store Owner of the merchandise you purchased from and payment services providers, who may be located outside your territory as well.

We will transfer your data only where the transfer is necessary for the performance of the contract between you and us. You are entitled to make a subject access request to receive a copy of the data we process about you, a data correction request as well as a right to reject to the use of your Information for direct marketing purposes by contacting our Data Protection Officer at dpo@global-e.com. ~~A fee may be chargeable by us for complying with a data access request.~~

Your rights and choice under 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. As a Hong Kong data subject you have legal rights in relation to the Information we hold about you (to the extent permitted under applicable laws and regulations).

Additional Information for Residents of Japan

Transferring Personal Information outside your Territory

As we are an international company, we may securely share your Information with our Affiliates and our approved partners located all over the world where necessary for the fulfilment of your purchases and performance of our services, as detailed in this Policy.

By using the Services you provide your consent to your Information and sensitive personal Information being collected, used, disclosed and transferred cross-border in accordance with this Policy and transferred between Global-e entities, as detailed under "[transferring Personal Information outside your territory](#)", to any jurisdiction where we have databases or affiliates and, in particular, to the EU and the US.

You may request us to notify you about the purposes of use of, to disclose, to make any correction to, to discontinue the use or provision of, and/or to delete any and all of your Information which is stored by us, to the extent provided by the Act on the Protection of Personal Information of Japan. When you wish to make such requests, please contact us at dataprotection@global-e.com.

Additional Information for Singapore Residents

By using the Services, you signify that you have read and understood this Policy. To the extent required under applicable law, you also provide your consent to us collecting, using and disclosing your personal information in accordance with this Policy.

Transferring Personal Information outside your Territory

We will transfer Information (including your name, email address, physical address and telephone number) to shipping service providers, Store Owners of merchandise you purchase from us, payment services providers, customs/clearance brokers and logistics providers who fulfil your orders. Information will be transferred only where necessary for the fulfilment of your purchases.

Your rights and choice under the Personal Data Protection Act 2012

Under the Personal Data Protection Act 2012, 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.

As a Singaporean data subject you have legal rights in relation to the Information we hold about you (to the extent permitted under applicable laws and regulations).

You are entitled to make a subject access request to receive a copy of the data we process about you, a data correction request as well as a right to reject to the use of your Information for direct marketing purposes. We will not charge any fee for complying with a data access request.

Additional Information for South Korean Residents

Transfer of Personal Information outside your Territory

By using the Services you provide your consent to your Information and sensitive personal Information being collected, used, disclosed and transferred cross-border in accordance with this Policy to any jurisdiction where we have databases or affiliates and, in particular, to US, Ireland and Germany.

Protecting Personal Information

We take the following steps to ensure the safety of personal information:

1. Administrative Measures: Establishment and implementation of internal management plans, regular employee training, etc.
2. Technical Measures: Management of access rights to personal information processing system, installation of access control system, encryption of unique identification information, installation of security programs.
3. Physical Measures: Control access to computer rooms, data storage rooms, etc.

We retain personal information for specified retention periods pursuant to certain tax and export controls laws to which we are subject. We store, in an isolated and highly secured fashion, personal information recorded and stored in the form of electronic files so that the records cannot be accessed or reproduced without strict procedures and subject to meeting certain criteria of necessity. After the end of the relevant retention period, personal information recorded and stored in electronic files will be securely destroyed using technical measures to prevent the possibility of recovery and paper records will be either shredded or burned.

The laws of Korea, including the Act on the Consumer Protection in Electronic Commerce, Etc. (E-Commerce Consumer Protection Act), the Framework Act on Electronic Documents and Transactions, and the Protection of Communications Secrets Act, require retention of certain types of information for a certain period of time, as follows:

E-Commerce Consumer Protection Act	Records of contracts or cancellation of orders shall be retained for a period of five (5) years.
	Records of payments and provision of goods shall be retained for a period of five (5) years.
	Records of consumer complaints or dispute resolution shall be retained for a period of three (3) years.
Framework Act on Electronic Documents and Transactions	Records of electronic document distribution via certified electronic address shall be retained for a period of ten (10) years.
Protection of Communications Secrets Act	Sign-in records shall be retained for a period of three (3) months.

Personal Information Protection Officer

We have designated the person in charge of personal information protection as follows in order to take full responsibility for the handling of personal information, and to handle complaints from and remedy damages suffered by our users related to our processing of personal information:

Name: Oded Griffel
Position: DPO
Contact Information: dpo@global-e.com

Specific Provisions for Certain U.S. Residents

This section applies solely to individuals who reside in U.S. states with consumer data protection laws. California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Montana, Oregon, Tennessee, Texas, Utah, Virginia and any other U.S. states provide (now or in the future) their state residents with rights related to their information. We adopted this section to comply with these laws, including the California Consumer Privacy Act of 2018 ('CCPA'), and the California Privacy Rights Act of 2020 ('CPRA') and any terms defined in the abovementioned consumer data protection laws have the same meaning when used in this section.

Categories of Personal Information we collect

We have collected the following categories of Information from consumers within the last twelve (12) months:

- Identifiers and 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.
- Commercial information such as products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- 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.
- Geolocation data, such as your physical location
- Card details for processing the transaction of the merchandise
- 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.

How we collect the Information

We obtain the categories of Information listed above from the following categories of sources:

- Directly and indirectly from you and your activity on our Service.
- Third parties such as our retailers.

How we use the Information we collect

We use the Information we collect for one of the following business purposes:

- To fulfill the reason for which the Information is provided.
- To provide you with our products and services and to further develop and improve our products and services.
- To enforce our terms and as necessary to protect our rights.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.

We do not sell your Information for monetary or other valuable consideration. **In the preceding twelve (12) months, we have not sold Information.** We disclose Information to third parties for business purposes as described in this Policy under "[Sharing your personal Information](#)".

In the preceding twelve (12) months, we have disclosed the following categories of Information for business purposes:

- Identifiers, which We have shared with the following categories of third parties: service providers involved in the performance of the fulfilment of the sales contract you entered into, including the retailer;

- Commercial information, which We have shared with the following categories of third parties: the retailer of the merchandise you have purchased from us, the shipper that delivered your purchase to, the bank or payment service provider that acquired the transaction for purchasing the merchandise.

How we retain the Information

Your Information will be retained by us as necessary to and relevant to our legitimate operations, including time necessary to identify, issue or resolve legal proceedings, enforce our terms of sale, to meet our reporting requirements and as otherwise required in accordance with applicable law obligations.

Your Rights

You may be entitled to the following specific rights under state consumer data protection laws regarding your Information:

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 Information over the past 12 months. Upon confirmation of your request, We will disclose to you:

- The categories of Information We collected about you;
- The categories of sources for the Information We collected about you;
- Our business or commercial purpose for collecting that Information;
- The categories of third parties with whom we share that Information;
- The categories of Information that we disclosed for a business purpose, and the categories of third parties to whom we disclosed that particular category of Information;
- The specific pieces of Information We collected about you;

If We disclosed your Information for a business purpose, we will provide you with a list which will identify the Information categories that each category of recipient obtained.

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

Nondiscrimination Right. You have the right not to be discriminated against for exercising any of the aforementioned rights.

The Right to Correction (Excluding Iowa and Utah). if you find that the data is not accurate, complete or updated, then you may provide us with the necessary information to rectify it and 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.

The Right to Opt Out. You have the right to opt out of personal information processing for purposes of targeted advertising (excluding Iowa), data les, or profiling in furtherance of decisions that produce legal or similarly significant effects (Excluding Iowa and Utah).

The Right to Control Sensitive Information Disclosures. You have the right to limit the use and disclosure of sensitive information (California) or to consent to the collection of sensitive information.

Exercising Your Rights. To exercise the above rights described above, please submit your request to us by sending an email to: dataprotection@global-e.com. Only you or a person authorized to act on your behalf, may make a request related to your Information. You may also make a verifiable consumer request on behalf of your minor child. If you submit your request through an authorized agent, we may request that the agent provide proof of your prior authorization, as well as information necessary to verify your identity.

A request for access can be made by you only twice within a 12-month period.

We may ask you to provide additional information in order to verify your identity before we respond to your request. We cannot respond to your request or provide you with the requested Information if we cannot verify your identity or authority to make the request and confirm the Information relates to you. We will only use the Information provided in your request to verify your identity or authority to make the request.

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.

Any disclosures we provide will only cover the 12-month period preceding receipt of your request.

The response we provide will also explain the reasons we cannot comply with a request, if applicable. If we cannot comply with a request, you have the right to appeal this decision (excluding California). To make an appeal, follow the instructions provided in our communications with you.

For data portability requests, we will select a format to provide your 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.

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.

Additional U.S. Rights

Nevada provides its residents with a limited right to opt-out of certain personal information sales. Residents who wish to exercise this sale opt-out rights may submit a request to opt out. However, please know we do not currently sell data triggering that statute's opt-out requirements.

California's "Shine the Light" law (Civil Code Section § 1798.83) permits California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to dataprotection@global-e.com.

Specific Provisions for Brazil Residents

Children's Privacy

The Service is not structured to attract or be directed to anyone under the age of 18 years. Accordingly, we do not intend to collect Information from anyone we know to be under that minimum age.

If we learn that we have collected Information from a person who is younger than 18 years or under 14 years without parental consent, we will delete that information quickly. If you believe that we have any such information, please contact us at: dataprotection@global-e.com.

Transferring Personal Information outside your territory

If the transfer of your Information is governed by the LGPD, and your data is transferred to another jurisdiction outside Brazil, your data will be secured by appropriate safeguards as set forth in LGPD Arts. 33, 34 and 35, in particular, but without limitation to, by the use of the Standard Contractual Clauses for the transfer of data between Brazil and other jurisdictions.

If you are a Brazilian resident, you may be entitled to the following specific rights under the LGPD regarding your Information:

- The right to anonymize, block or erase data that is unnecessary, excessive or processed in violation of the LGPD;
- The right to erase data that was processed based on consent, unless an exception applies;
- The right to confirm and access the Information we collect about you;
- The right to port data to another service provider;
- The right to receive information about the public and private entities with whom the controller has shared data;
- The right to receive information about the possibility of not providing consent (when it is required);
- The right to withdraw consent, when applicable;
- The right to lodge a complaint with the Brazilian Data Protection Authority; and
- The right to object to a processing activity when the processing activity violates the LGPD

Exercising Your Rights

To exercise the rights described above, please submit your request to us by sending an email to: dataprotection@global-e.com.

Only you or a person authorized to act on your behalf, may make a request related to your Information. You may also make a verifiable consumer request on behalf of your minor child.

We cannot respond to your request or provide you with the requested Information if we cannot verify your identity or authority to make the request and confirm the Information relates to you. We will only use the Information provided in your request to verify your identity or authority to make the request.

We will respond to your request for access within 15 days of its receipt. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

For data portability requests, we will select a format to provide your 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.

Specific provisions for residents of Canada

If you are a resident of Canada, or if our processing of your Information is governed by Canadian privacy legislation (including, without limitation, the *Act respecting the protection of personal information in the private sector* (Québec), the *Personal Information Protection Act* (Alberta), the *Personal Information Protection Act* (British Columbia) or the *Personal Information Protection and Electronic Documents Act* (Canada)), the following additional terms apply. Your rights may differ depending on your province or territory of residence within Canada: please consult the section below relevant to your place of residence.

Consent

Unless otherwise allowed by the laws applicable in your province or territory of residence, we will only collect, use, communicate, or otherwise process your Information with your consent. You are generally not obliged to provide your Information, however please note that we may be unable to provide certain services to you if you refuse to do so.

Cross-border Data Transfers

As we are an international company, we may securely share your Information with our Affiliates and our approved partners located all over the world where necessary for the fulfilment of your purchases and performance of our services, as detailed in this Policy.

We may communicate, store and process your Information outside of your province or territory of residence, in any country where we have facilities or in which we engage service providers. This includes, as detailed under the section “Transferring Personal Information outside your territory” of the Policy, the EU, where our Global-e data servers are based, and the US, where our Borderfree data servers are based.

These other jurisdictions may have data protection rules that are different from those of your place of residence. Your Information, which is transferred to the U.S., can be processed by U.S. law enforcement agencies, or any other entities under the applicable U.S. law.

Whenever we transfer your Information outside of your jurisdiction of residence, we will only do so in full compliance with all the requirements of applicable privacy laws, and we will ensure that adequate safeguards are in place so that your Information will receive an adequate degree of protection in the jurisdiction of destination.

Privacy rights

As a resident of Canada, you have the following rights regarding Information that we hold, subject to any conditions or limitations set out in applicable law:

- You have the right to obtain information about our processing of your Information and obtain access to and a copy of your Information that we hold.
- You may have the right to update, complete, or correct inaccuracies in your Information.
- You have the right to withdraw your consent to our processing of your Information, without affecting the lawfulness of processing up until withdrawal. Please note that we may be unable to offer you certain services or process certain orders for you if you withdraw your consent. Withdrawing your consent does not create an obligation for us to delete Information which we are otherwise allowed or required to retain under applicable law.

If you are a resident of the province of Québec, the following rights are available to you, in addition to the rights identified above:

- You may have the right to obtain a copy of your Information that we hold in a structured, commonly-used technological format, and that we transmit it to another third party you designate, where technically feasible.
- You have the right to request, in certain circumstances, that we cease disseminating your Information or to de-index any hyperlink that allows access to that Information by technological means, if such dissemination contravenes applicable law or a court order.

Please note that some of these rights may be limited, for example, if fulfilling your request would reveal personal information about another person, or if you ask us to delete Information which we are required by law to retain.

To exercise the rights described above, please submit your request to us by sending an email to: dataprotection@global-e.com.

Complaints to Supervisory Authorities

You have the right to lodge a complaint with the relevant data protection authority of your habitual residence, your place of work or the place of the alleged infringement/violation of your rights. You may raise a concern or file a complaint with the Federal Office of the Privacy Commissioner at <https://www.priv.gc.ca/en>. If you are a resident of the province of British Columbia, you should contact the the Office of the Information & Privacy Commissioner for British Columbia at <https://www.oipc.bc.ca/>. If you are a resident of the province of Alberta, you should contact the Office of the Information and Privacy Commissioner of Alberta at <https://oipc.ab.ca/>. If you are a resident of the province of Québec, you should contact the Quebec Commission d'accès à l'information at <https://www.cai.gouv.qc.ca/>

Specific provisions for residents of Croatia

Data retention

We process your personal information until the purpose of processing personal information is met. After the end of the purpose for which they were collected, we retain your personal information for specific retention periods pursuant to tax and accounting legislation to which we are subject.

Information on data protection supervisory authority in Croatia

Croatian Personal Data Protection Agency (*Cro. Agencija za zaštitu osobnih podataka*)

Address: Selska cesta 136, Zagreb

Phone number: +3851 4609 000

e-mail: azop@azop.hr

Website: www.azop.hr