WORLDTRADERS AI

PRIVACY NOTICE

Osben Export-Import • Osben Digital • privacy@worldtradersai.com • worldtradersai.com — Version 1 • Effective 16 November 2026 • Last updated 16 November 2026

1. ABOUT THIS PRIVACY NOTICE

1.1 This Privacy Notice explains how Osben Export-Import ("**Osben**", "**we**", "**us**") processes personal data when you visit worldtradersai.com (the "**Website**") or use WorldTraders AI (the "**Service**"). It meets our information duties under Articles 13 and 14 of the General Data Protection Regulation (EU) 2016/679 ("**GDPR**").

1.2 It applies to (a) visitors to the Website, (b) individuals who hold a user account under a business customer's subscription ("**Authorised Users**"), and (c) people who contact us. The Service is offered to business customers only (Section 2 of the Terms of Service). We do not knowingly offer it to consumers.

1.3 Terms written with capital letters that are not defined here (for example "Customer Content", "Approval Record" and "Unlock") have the meaning given in the Terms of Service.

1.4 This notice does not cover personal data that a customer enters into the Service as Customer Content. For that data, the customer is the controller and we act as its processor under the data processing agreement (see Section 2.3).

2. WHO IS RESPONSIBLE

2.1 **Controller.** Benson Success Osawe, sole proprietor, trading as Osben Export-Import, Bruchstr. 106, 40235 Düsseldorf, Germany. WorldTraders AI and Osben Digital are further names used by the same business, not separate legal entities. Commercial register: none; the business is registered with the trade office only. VAT ID: DE352920580. Privacy contact: privacy@worldtradersai.com. Postal address for privacy requests: as above.

2.2 **Data protection officer.** We have not appointed a data protection officer because the law does not require one for our business (Article 37 GDPR; § 38 BDSG). Please send all privacy matters to the privacy contact in Section 2.1.

2.3 **Our two roles.** We are the controller for the data described in this notice: account data, sign-in data, approval and unlock records, log data, visitor data and correspondence. We are the processor for personal data that a customer places in its Customer Content. If your personal data appears in a customer's Customer Content, please contact that customer; we will help the customer to answer your request.

3. OVERVIEW OF PROCESSING

The table summarises what we do with personal data. Sections 4 to 9 give the details.

Activity	Personal data	Purpose	Legal basis (GDPR)
Account creation and sign-in	Work e-mail address; name (optional); password credentials; for Google sign-in, the name and e-mail address Google returns	Open and manage your account; authenticate you	Art. 6(1)(b)
Account e-mails	E-mail address; confirmation link	Confirm your address and secure the account	Art. 6(1)(b)
Approve and Lock and Unlock records	User identity; e-mail; server time; for each approval the confidence score, provisional-checkbox status, missing-information labels and disclaimer version	Provide the approval workflow; evidence of who approved what and when; defend legal claims	Art. 6(1)(b) and (f)
Security and operation of the Website and Service	IP address; request metadata; timestamps; technical logs	Keep the Service available and secure; prevent abuse	Art. 6(1)(f)
Support and legal correspondence	Your messages; contact details; the content of your enquiry	Answer enquiries; handle legal notices	Art. 6(1)(b) or (f)
Legal claims and legal duties	Records described above, as necessary	Establish, exercise or defend legal claims; meet retention duties	Art. 6(1)(f); Art. 6(1)(c)
Strictly necessary storage on your device	Security cookie set by Cloudflare; cookie that routes you to a consistent version of the Website; sign-in session	Deliver and secure the Website and keep you signed in	Art. 6(1)(f) GDPR; § 25(2) no. 2 TDDDG
Platform provider's own logs	Technical and log data about use of the platform	Operate and secure the platform; aggregated or de-identified data	Our platform provider, as independent controller, under its own privacy policy
Visitor analytics	None collected: the platform's page-view analytics are switched off	Not applicable	Not applicable

4. THE DATA WE PROCESS

4.1 Account data

When an Authorised User registers, we process the work e-mail address, the name if the user gives it, and the credentials needed to sign in. We receive this data from you or, for Google

sign-in, from Google. It is needed to create and run the account, so we cannot provide an account without it.

4.2 Sign-in with Google

If you choose “Continue with Google”, Google authenticates you. Google acts as an independent controller for that step and applies its own privacy policy (https://policies.google.com/privacy). We receive your name and e-mail address from Google and use them only as described in this notice. You can avoid Google by registering with your work e-mail address and a password.

4.3 Account confirmation e-mails

We send a confirmation e-mail containing a confirmation link to the address you register. The e-mail is sent through the e-mail service built into our platform provider’s environment. Our platform provider does not say which e-mail service it uses or where; it publishes a list that includes AWS SES (region not stated) and Mailgun (United States).

4.4 Approval and Unlock records

When an Authorised User approves a result with “Approve and Lock”, the Service creates an Approval Record as a separate entry in an append-only log. From 15 October 2026 each entry records the user’s identity and e-mail address, the server time, the confidence score, whether the provisional-result checkbox was ticked, the missing-information labels shown and the version of the disclaimer displayed. Each Unlock is recorded as a further separate entry (user, e-mail and server time). Entries cannot be edited or deleted through the Service or its database rules. Unlocks made before 15 October 2026 were not logged.

We keep these records so that you, your employer and we can show who approved a result and when, and to protect against and answer legal claims. We use the same records to keep the Service secure and to monitor its operation in aggregated form.

4.5 Website and server logs

When you visit the Website or use the Service, our network edge provider (Cloudflare) and our platform provider process technical data such as your IP address, the date and time of the request, the page or function requested and device and browser information. We use this data to deliver pages, protect against attacks and abuse, and find faults.

4.6 Support and legal correspondence

If you write to us, we process your contact details and the content of your message to answer you and to keep a record of the matter. Our mailboxes support@, privacy@ and legal@worldtradersai.com are hosted by Zoho Mail in Zoho’s EU data centre (see Sections 7 and 8). Please do not send personal data that is not necessary.

4.7 Analytics

Our platform provider offers page-view analytics for published apps. When switched on, they record the full address of each page requested and a session identifier for each page view. We have switched these analytics off for the Website and the Service, so they collect nothing about you. We do not use any analytics tool of our own.

4.8 Fonts

The Website uses fonts hosted by us. Your browser does not load fonts from Google or any other third-party server.

4.9 What we do not want

Please do not enter special categories of personal data (Article 9 GDPR), data about criminal convictions or personal data that is not necessary for classification in product descriptions or other fields. The Terms of Service ask customers to enter only business contact data where personal data is unavoidable. We do not knowingly process the data of children.

5. LEGAL BASES AND LEGITIMATE INTERESTS

5.1 **Performance of a contract (Art. 6(1)(b)).** We process account, sign-in, e-mail and approval data to provide the Service under the agreement with your employer or principal and, for the Authorised User, to take steps at that user's request.

5.2 **Legitimate interests (Art. 6(1)(f)).** We rely on legitimate interests where they are not overridden by your interests or fundamental rights. Our interests are: (a) securing the Service and detecting abuse; (b) keeping reliable records of approvals and unlocks as evidence; (c) establishing, exercising and defending legal claims; (d) improving the Service through aggregated, de-identified operational metrics; and (e) communicating about the contract. You may object (Section 12.5).

5.3 **Legal obligation (Art. 6(1)(c)).** We process data where German or EU law requires it, for example commercial and tax retention duties.

5.4 **Consent (Art. 6(1)(a)).** We do not currently rely on consent. If we introduce optional cookies or similar technologies, we will ask for consent first and you can withdraw it at any time with effect for the future.

6. HOW THE AI FEATURES USE DATA

6.1 **What is sent.** When you request a classification, the product description, the origin and destination, and any optional material or technical text that you enter are sent through the AI gateway of our platform provider to an AI model provider. The provider returns the suggested HS code, confidence score, permits and reasoning.

6.2 **What is not sent.** We do not send names, e-mail addresses or Approval Records to the AI gateway.

6.3 **Which providers.** The AI model provider that serves a request is chosen by our platform provider, which does not tell us which one it chooses. It has told us that requests enter its gateway in the European Union and may be forwarded to provider endpoints in the United States. The providers that may serve requests include Google (Vertex AI), Microsoft (Azure AI Foundry), Amazon Web Services (Bedrock), OpenAI, Anthropic and OpenRouter, in the EU or the United States. The full list is at our platform provider's Trust Center.

6.4 **Training.** We do not use your Customer Content to train or fine-tune any model. Our platform provider's data processing agreement bars it from training or fine-tuning on Customer Personal Data. It has also told us that its agreements with AI model providers limit their use of content to delivering the service and bar training, although that is not set out in the agreement text. On 16 October 2026 we switched off the model-training setting for our own content in our platform account; that setting does not cover users' data. Our platform provider reserves the right to use data about the use of its service ("Service Data") to train its own models, and we cannot switch that off.

6.5 **No automated decisions about you.** Output is a draft suggestion. An Authorised User must review it and decide whether to approve it. We do not take decisions that produce legal or similarly significant effects on individuals solely by automated means (Art. 22 GDPR).

6.6 **Accuracy.** AI suggestions can be wrong. See the Terms of Service for the customer's duties to verify results.

6.7 **AI request and response logs.** While the project setting "AI app context" is on, our platform provider keeps the content of AI requests and responses in the project's AI logs, where we can see it for debugging. We have switched the setting off, so new requests are logged without their content.

6.8 **Retention by AI providers.** Our platform provider does not publish how long it or its AI model providers keep request and response content, and it does not describe any arrangement as zero data retention. We therefore make no promise about retention at the AI model provider. We will update this notice if we obtain retention periods.

6.9 **Our platform provider's own use.** Our platform provider acts as an independent controller for its own Service Data, Log Data and aggregated or de-identified data, under its own privacy policy. That policy names Lovable Labs Sweden AB, Regeringsgatan 25, 111 53 Stockholm, Sweden, as the controller for that processing; Lovable's data processing agreement gives the same address under the name "Lovable Labs AB". You can address requests about that processing to that company.

7. WHO RECEIVES YOUR DATA

We share personal data only where necessary for the purposes above. Recipients that process data on our behalf are bound by data processing agreements under Article 28 GDPR, either directly or through our platform provider (Article 28(4) GDPR).

Recipient	Role	Purpose	Data
Lovable Labs Incorporated, 1 Lincoln St, Boston, MA 02111, United States	Processor (and independent controller for its own service and log data)	Application platform: database, login, built-in e-mail, AI gateway	Account data; approval and unlock records; Customer Content
AI model providers that may serve requests: Google, Microsoft (Azure), Amazon Web Services, OpenAI, Anthropic, OpenRouter	Sub-processors of Lovable	Generating classification suggestions	Product description, origin, destination, optional text
E-mail delivery service engaged by Lovable (it lists AWS SES and Mailgun as possible services)	Sub-processor of Lovable	Sending confirmation e-mails	E-mail address; confirmation link
Cloudflare	Sub-processor of Lovable (we have no contract of our own with Cloudflare)	Edge routing, DNS and security	Visitor traffic; IP address
Zoho (Zoho Mail), including its group company Zoho Corporation Private Limited (India) for limited technical support	Processor (our own e-mail service, under a data processing agreement based on standard contractual clauses)	Hosting our mailboxes support@, privacy@ and legal@worldtradersai.com; sending, receiving and storing correspondence	E-mail address, message content and metadata of messages you send us or we send you
Google	Independent controller (only if you choose Google sign-in)	Authentication	Name and e-mail address returned to us
Professional advisers, insurers, auditors	Controllers or processors	Legal advice, claims, audits	Records necessary for the matter
Authorities and courts	Controllers	Where required by law or to protect rights	As required

Our platform provider does not say which listed provider handles each request, so the table names every provider that may do so. Its full list of service providers is at its Trust Center and changes from time to time; we subscribe to its updates and will update this notice if a change affects personal data.

We do not sell personal data. If our business is sold or reorganised, we may disclose data to the acquirer subject to confidentiality and data protection safeguards.

8. TRANSFERS OUTSIDE THE EEA

8.1 **Our platform provider and the United Kingdom.** The application database is hosted in the United Kingdom (London), as our platform provider told us; its stated default for the database is the EU. Our contracting party, Lovable Labs Incorporated (1 Lincoln St, Boston, MA 02111, United States), is established in the United States, so making data available to it is a transfer to a third country. Lovable's data processing agreement, which has applied to our workspace since 21 October 2026, incorporates the EU standard contractual clauses (Commission Implementing Decision (EU) 2021/914), Module Two (controller to processor) and, where we act as processor, Module Three (processor to sub-processor), and, for the UK, the UK standard contractual clauses with the UK Addendum (Sections 8.2 and 8.3 of that agreement). Lovable has told us that it is not certified under the EU-US Data Privacy Framework and does not rely on an adequacy decision. We therefore rely on those standard contractual clauses for transfers to Lovable, and not on the EU-US Data Privacy Framework. Lovable's agreement also allows it to suspend the affected transfers and the related processing without breach if a transfer mechanism becomes invalid; parts of the Service may then be unavailable (see Section 15.1 of the Terms of Service). For storage in the United Kingdom, the European Commission's adequacy decisions for the UK, renewed on 19 December 2025 and valid until 27 December 2031, also apply. If they lapse, the standard contractual clauses continue to apply.

8.2 **AI processing.** AI requests enter our platform provider's gateway in the European Union and may be forwarded to AI model provider endpoints in the United States, or to EU regions of those providers. Our platform provider has told us that these transfers are covered by standard contractual clauses (Module Three). We do not rely on the EU-US Data Privacy Framework for them.

8.3 **Cloudflare.** Cloudflare is a sub-processor of our platform provider, and we have no contract of our own with it. It operates a global network, so IP addresses and request data can be processed outside the European Economic Area. Our platform provider's data processing agreement (Section 8) allows such transfers only under an adequacy decision or appropriate safeguards, such as standard contractual clauses. Our platform provider has not told us which of these it relies on for Cloudflare. We will update this notice when it does.

8.4 **Our e-mail service (Zoho).** Our mailboxes support@, privacy@ and legal@worldtradersai.com are hosted by Zoho Mail in Zoho's EU data centre (mail.zoho.eu). Zoho states that EU data stays in the EU data centre and that its Indian group company, Zoho Corporation Private Limited, may in rare cases access data for technical support under standard contractual clauses between its group companies. Such access is a transfer to a third country. Zoho is our processor under a data processing agreement based on standard contractual clauses. We do not rely on the EU-US Data Privacy Framework for it.

8.5 **Copies.** You can ask us about the safeguards by contacting privacy@worldtradersai.com. Our platform provider has confirmed in writing (5 November 2026) that its transfer safeguards are the Standard Contractual Clauses (Module Two) incorporated by Section 8.2 of its data processing agreement, with Lovable Labs Incorporated as data importer, and that it will not provide a separate document. On request, we give you a copy of that confirmation and the links to its agreement.

9. HOW LONG WE KEEP DATA

Data	Retention
Account data	While the account is active and for three (3) months afterwards
Approval and Unlock records	For the term of the agreement and three (3) years afterwards; longer where necessary to establish, exercise or defend legal claims or to meet legal retention duties, after which they are deleted or anonymised
Security and technical logs	We keep no security or technical logs ourselves. Logs are kept by our platform provider, which publishes no retention period
AI request and response content	Kept in the project's AI logs only while "AI app context" is on; we have switched it off, so new requests are logged without their content. Our platform provider does not publish retention periods for its own or its AI providers' systems
Account confirmation e-mails	Delivery records are kept by our platform provider's e-mail service; it does not publish a retention period
Support and legal correspondence	12 months after the matter is closed; longer if a claim is pending
Commercial correspondence and accounting records	For the periods required by § 257 HGB and § 147 AO, where they apply
Back-ups	Kept by our platform provider for a limited time under its retention schedule, which it does not publish

10. COOKIES AND SIMILAR TECHNOLOGIES

The Website and the Service store or read information on your device only where it is strictly necessary: a security cookie set by Cloudflare (__cf_bm), a cookie that routes you to a consistent version of the Website (_dpl / __dpl), and your sign-in session. We do not set analytics or marketing cookies. Our Cookie Notice lists each item and explains why no consent banner is needed.

11. SECURITY

We take technical and organisational measures that are appropriate to the risk, including role-based access control, logging of approval and unlock events, and separation of customer data. Our platform provider applies encryption in transit and at rest and the other measures that it describes in its own published materials. A summary is in Annex C.2 of our data processing agreement. No system is completely secure, so please protect your credentials and tell us at once if you suspect misuse.

12. YOUR RIGHTS

12.1 **Access (Art. 15).** You may ask whether we process personal data about you and receive a copy and the information listed in Art. 15.

12.2 **Rectification (Art. 16).** You may have inaccurate data corrected and incomplete data completed. Approval and Unlock records are append-only; where a record is inaccurate we add a correcting entry rather than alter the original.

12.3 **Erasure (Art. 17).** You may ask us to delete data where, for example, it is no longer needed, you object and we have no overriding grounds, or it was unlawfully processed. We may keep data that we need to establish, exercise or defend legal claims or to meet legal duties.

12.4 **Restriction (Art. 18) and portability (Art. 20).** You may ask us to restrict processing in the cases in Art. 18. Where we process data by automated means on the basis of a contract, you may receive it in a structured, commonly used, machine-readable format.

12.5 **Objection (Art. 21).** You may object at any time, on grounds relating to your particular situation, to processing based on Art. 6(1)(f). We will then stop unless we show compelling legitimate grounds that override your interests, or the processing is needed for legal claims.

12.6 **Withdrawal of consent.** Where processing is based on consent, you may withdraw it at any time with effect for the future.

12.7 **How to exercise your rights.** Write to privacy@worldtradersai.com. We may ask for information to confirm your identity. We answer within one month; we may extend the period by up to two further months for complex or numerous requests and will tell you why. The first copy is free of charge.

12.8 **Complaints.** You may complain to a supervisory authority, in particular in the Member State of your habitual residence, place of work or the place of the alleged infringement. The authority responsible for us is the State Commissioner for Data Protection and Freedom of Information of North Rhine-Westphalia (Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen, “LDI NRW”), Kavalleriestraße 2–4, 40213 Düsseldorf, Germany.

13. IS PROVIDING DATA REQUIRED?

Providing account data is necessary to enter into and perform the user agreement; without it we cannot open or run an account. Technical data is processed automatically when you use the Website. Providing other data is voluntary.

14. THIRD-PARTY PERSONAL DATA IN CUSTOMER CONTENT

Customers are responsible for the lawfulness of the Customer Content they enter and for informing any individuals concerned (Art. 14 GDPR). We process such data only on the customer's instructions. We do not use it for our own purposes, for service improvement or for training models.

15. LINKS TO OTHER WEBSITES

The Website may link to other sites, such as Google's privacy policy. We are not responsible for their content or privacy practices.

16. CHANGES TO THIS NOTICE

We may update this notice when the Service, our providers or the law change. The current version is at https://worldtradersai.com/privacy. We will tell account holders of material changes by e-mail or in the Service, and the "last updated" date above shows the current version.

Version	Date	Change
1	16 November 2026	First version

17. CONTACT

Osben Export-Import, Bruchstr. 106, 40235 Düsseldorf, Germany. Privacy: privacy@worldtradersai.com. General enquiries and support: support@worldtradersai.com.