

Pixeled • Privacy Policy

Controller	Pixeled, the sole proprietorship of R.R.J. Delil
Chamber of Commerce (KvK)	99063093
VAT number	NL003008030B18
Registered address	Beeldsnijdersgaarde 30, 2542 EM The Hague, the Netherlands
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This privacy policy explains how Pixeled ("we", "us") processes personal data in connection with our website and our consultancy and development services. This policy does not apply to Pixeled's online products, such as Convecho and judge.photo; each of those products has its own privacy policy.

1. Who we are

Pixeled is a Dutch consultancy and development practice for AI and IT challenges. The controller for the processing described in this policy is Pixeled, the sole proprietorship of R.R.J. Delil, located at Beeldsnijdersgaarde 30, 2542 EM The Hague, registered with the Dutch Chamber of Commerce under number 99063093. For privacy questions or requests, contact info@pixeled.solutions.

2. What personal data we process

- **Contact details of (prospective) clients:** name, role, organisation, email address, telephone number, and the content of our correspondence, when you contact us or we contact you.
- **Engagement and file data:** quotations, agreements, project documentation, reports, and other data needed to perform and record an engagement.
- **Billing and administration data:** the data shown on quotations and invoices (name, organisation, address, VAT details, amounts) and our financial records.
- **Website data:** technical server data such as the IP address in server logs, retained briefly for security and troubleshooting. Our website uses no tracking or advertising cookies and no third-party analytics services.

3. Purposes and legal bases

We process this data to:

- **maintain contact and issue quotations** (legal basis: our legitimate interest in maintaining business relationships, or pre-contractual measures at your request).
- **perform and record engagements** (legal basis: performance of the agreement).
- **invoice and keep our records** (legal basis: performance of the agreement and our statutory, fiscal, obligations).
- **keep our website secure and available** (legal basis: our legitimate interest in a secure, reliable website).

We do not sell personal data and do not send unsolicited newsletters.

4. When we act as a processor

Where Pixeled carries out work in an engagement that involves processing personal data on behalf of a client, for example when building or managing a system containing the client's customer data, that client is the controller and Pixeled is the processor. That processing is governed by the client's privacy policy and by the data processing agreement we conclude with the client, not by this policy.

5. Recipients and processors

We share personal data only with service providers we need for our operations: our hosting and email providers (Proton, Switzerland; Hostinger, EU; Scaleway, EU), our AI model and software suppliers (Mistral, EU; Anthropic, US), and our administration and accounting software (Knab Digiboox, EU). Where required, we conclude a data processing agreement with processors. Data may additionally be shared where a legal obligation exists, for example with the Dutch Tax Administration.

6. Retention periods

- **Financial records and invoices:** seven years (statutory fiscal retention obligation).
- **Engagement files and project documentation:** up to five years after the end of the engagement, in connection with possible questions, follow-up engagements, and limitation periods, unless a longer statutory period applies.
- **Correspondence with prospective clients that does not lead to an engagement:** up to one year after the last contact.
- **Website server logs:** briefly, solely for security and troubleshooting.

7. International transfers

Most of our systems and core processors operate within the EU/EEA. Transfers outside the EEA are covered by appropriate safeguards, such as a European Commission adequacy decision (for example for Switzerland), certification under the EU-US Data Privacy Framework, or standard contractual clauses.

8. Security

We take appropriate technical and organisational measures to protect personal data, including encrypted connections, encrypted storage, restricted access to systems and devices, and two-factor authentication on our accounts.

9. Your rights

Under the GDPR you have the right to access, rectify, erase, restrict, and port your personal data, and the right to object to processing based on our legitimate interest. To do so, contact info@pixeled.solutions. You also have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

10. Cookies

Our website uses only technically necessary cookies or similar storage, to the extent needed to make the site work. We do not use tracking or advertising cookies and do not follow you across other websites.

11. Changes to this policy

We may update this privacy policy. The current version is published on our website, with the version number and date shown in this document.

This privacy policy is available in Dutch and in English. In the event of any difference between the two versions, the Dutch text prevails.

12. Contact

For privacy questions or to exercise your rights, contact info@pixeled.solutions, Pixeled, Beeldsnijdersgaarde 30, 2542 EM The Hague, the Netherlands.